

<p style="text-align: right;">118</p> <p>1 Orley George Cameron 2 Q. Are those the records you are 3 referring to when you say you have updated the 4 records? 5 A. Right, um-hum. 6 Q. Do you know what the current amount 7 of the discrepancy you identified is? 8 A. No. I have not -- I don't have it 9 in front of me. 10 Q. But is that the figure you could 11 figure out if you saw your records? 12 A. Yes. 13 Q. Do you have any idea of what it is 14 as we sit here today? 15 A. No, because I remember there was 16 2.1 million on Lakeview specifically, yes. 17 Q. The 2.1 million for Lakeview that 18 you are recalling, that is information you 19 haven't been able to get the records to 20 verify? 21 A. Right, to vouch, right, or some of 22 the records that we received is not clear. 23 Q. So if you were to review -- 24 MR. HAYWOOD: I am sorry. The 25 witness was still answering.</p>	<p style="text-align: right;">120</p> <p>1 Orley George Cameron 2 MR. TRAUB: I have a few. 3 EXAMINATION 4 BY MR. TRAUB: 5 Q. The loss that was reported in 2006 6 for Lakeview, that included depreciation and 7 amortization, did it not? 8 A. I'm sure it would, yes. 9 Q. Those are non-cash items, isn't that 10 correct? 11 A. Correct. 12 Q. And you actually found invoices to 13 support expenditures in excess of \$3 million 14 for 2006 on Lakeview; did you not? 15 A. Since we have a difference, the 16 expenditures -- I don't recall. I don't 17 recall. 18 Q. In the invoices and the backup 19 documentation that you have been provided, 20 have you found any discrepancies between those 21 invoices or other items and the amounts 22 reported in the general ledger? 23 A. The discrepancy between those 24 amounts, yes, because one of which I pointed 25 out was that invoice from Marks Paneth & Shron</p>
<p style="text-align: right;">119</p> <p>1 Orley George Cameron 2 A. (continuing) I am saying some of the 3 records we received were not clear. 4 So, for example, we had asked for 5 information to support the prepaid real estate 6 tax. The information we got is actually a 7 printout from the Department -- from the 8 New York City Tax Department, which shows 9 payment for tax for the current period. 10 I think there was one payment for a 11 subsequent period, which did not amount to the 12 amount on the -- we can go over it, the 13 records I got -- that amount on the balance 14 sheet or in the general ledger for prepaid 15 tax. 16 Q. So if you were provided the 17 appropriate record, you could then verify that 18 the amounts were paid properly? 19 MR. HAYWOOD: Objection as to what 20 the appropriate record is. 21 A. If we were provided the appropriate 22 record, yes, because that's what we do. We 23 look for appropriate records. 24 MR. KELLY: I have no further 25 questions.</p>	<p style="text-align: right;">121</p> <p>1 Orley George Cameron 2 for '05. 3 The invoice was dated in '05, but it 4 was for service and was capitalized for 5 service performed in '04. That's number one. 6 Number two, we saw -- there were 7 invoices, I think it was displayed at one of 8 the depositions, there was an invoice for 9 service that was provided in '04. 10 Actually, the invoice was dated in 11 '02, but it was expensed in '06. 12 Q. But the numbers were accurate, were 13 they not? 14 MR. HAYWOOD: Objection. 15 A. I don't know whether they were 16 accurate. 17 Q. In other words, the numbers that 18 were reported on the books and records were 19 the same as the numbers that are on the actual 20 invoices; isn't that true? 21 A. Right. It was compounded. So part 22 of that payment, it was a compound payment and 23 part of that payment and included in that 24 payment was an invoice dated from '02 and it 25 was expensed in '06.</p>

31 (Pages 118 to 121)

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<p style="text-align: right;">122</p> <p>1 Orley George Cameron 2 Q. And the numbers that were listed 3 on the 2002 invoice and the numbers that are 4 listed on the books and records for that 5 invoice, the payments are the same? 6 A. The payments are the same but there 7 is a problem with the invoice. 8 The invoice, if it was outstanding 9 from '02, I mean obviously there's a problem 10 with that, number one. 11 If the auditor was not paid since 12 '02 it's a problem with independence. That's 13 number one. 14 Number two, it was not accrued in 15 the financial statement before because it was 16 not listed as an outstanding amount, and if it 17 was, it also would pose an independence 18 problem. 19 And since it was dated in '02 and it 20 was paid in '06, it should have been adjusted 21 to the prior period and not be expensed in the 22 current period. 23 So there were quite a number of 24 issues with it. 25 Q. But, Mr. Cameron, my question to you</p>	<p style="text-align: right;">124</p> <p>1 Orley George Cameron 2 Q. If they were on an accrual basis, 3 they would have expensed that money in 2002, 4 is that correct? 5 MR. KELLY: Objection. 6 A. If I may answer the question or if I 7 may clarify the issue. I am using my 8 expertise as an accountant, if you will permit 9 me to answer the question. 10 MR. TRAUB: Before you do, 11 Mr. Haywoode -- 12 MR. HAYWOOD: Let's let him answer 13 the question. 14 MR. TRAUB: No. 15 Are you proffering him as an expert 16 on accounting? 17 MR. HAYWOOD: I am not dealing with 18 that now. 19 May we have his answer? Let's have 20 his answer and then -- Darren, you're 21 interrupting the witness's testimony. 22 MR. TRAUB: He is about to testify 23 as an expert on accounting. 24 THE WITNESS: As a professional 25 accountant.</p>
<p style="text-align: right;">123</p> <p>1 Orley George Cameron 2 is the numbers -- 3 A. The amounts. 4 Q. -- the amounts are the same? 5 A. Yes. 6 Q. And the same question for the 2005 7 approximately \$22,000 invoice that you were 8 referring to, the amounts are the same on the 9 invoice than are listed in the books and 10 records; is that correct? 11 A. Yes. 12 EXAMINATION 13 BY MR. HAYWOOD: 14 Q. May I inquire on this point: 15 These books are kept on the accrual 16 basis and expense accrued in 2002 would have 17 been expensed in 2002; is that correct? 18 MR. TRAUB: Objection. 19 I want to quickly correct your 20 question. 21 MR. HAYWOOD: Hold it. 22 MR. TRAUB: The books are on a cash 23 basis. 24 MR. HAYWOOD: Let's let him answer 25 it.</p>	<p style="text-align: right;">125</p> <p>1 Orley George Cameron 2 MR. TRAUB: Are you proffering 3 him as an expert on accounting, 4 Mr. Haywoode? 5 MR. HAYWOOD: I am asking that the 6 witness answer the question, and you can 7 put any other question you have. 8 EXAMINATION 9 BY MR. HAYWOOD: 10 Q. Do you recall the question? 11 A. No. Could you remind me of the 12 question? 13 Q. If I am on the accrual basis and I 14 receive money in 2005, the money to Marks 15 Paneth & Shron, would it not have been 16 expensed -- I'm sorry -- in 2002, would it not 17 have been expensed in 2002 and deducted in 18 2002? 19 A. That is correct. 20 MR. TRAUB: Objection. 21 Q. Now, if it later appeared in 2006 22 and was deducted in 2006 again in whole, 23 wouldn't I be expensing the same amount of 24 money twice in two different years? 25 A. That is correct.</p>

32 (Pages 122 to 125)

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1	Orley George Cameron	126	1	Orley George Cameron	128
2	MR. KELLY: Objection.		2	expense that money yet again; would it not?	
3	Q. Now, you heard testimony here that		3	MR. TRAUB: Objection.	
4	\$181,000 in 2000, I believe Mr. Dawley		4	Calls for an improper hypothetical	
5	testified to it, was made payable to Dalton,		5	and a legal conclusion.	
6	which was really money that was owed to		6	MR. KELLY: Objection.	
7	Prestige Management, Marion Scott Management		7	A. Yes, but if it's paid out again it	
8	and Grenadier Management -- did you hear that		8	doesn't have to be expensed because it's not	
9	testimony?		9	really accrued.	
10	MR. TRAUB: Objection to form.		10	So when you pay the second time,	
11	Misstates prior testimony.		11	it's not expensed.	
12	MR. KELLY: Objection.		12	Q. It shouldn't be expensed?	
13	MR. TRAUB: And for the record,		13	A. It shouldn't be expensed.	
14	Mr. Edmonds actually testified that he		14	Q. So that if Mr. Dawley testified at	
15	believed that money is due to him.		15	his deposition that the money was being held	
16	MR. HAYWOOD: Counsel is testifying		16	and could be expensed a second time in paying	
17	now.		17	it to the managing general partners, that	
18	Q. Did you hear about the 181,000		18	would be a double expensing of the same amount	
19	previously that Mr. Dawley I believe testified		19	of money; would it not?	
20	was attributed as being payable to Dalton		20	MR. TRAUB: Objection.	
21	though it was owed to the previous management		21	Misstates prior testimony.	
22	company before Dalton came on board? Did you		22	MR. KELLY: Objection.	
23	hear that testimony?		23	A. I mean, if it was expensed, but I	
24	MR. KELLY: Objection.		24	don't think -- just to add, I don't think the	
25	A. I heard the testimony from Dawley,		25	issue was whether or not it could be expensed	
	127			129	
1	Orley George Cameron		1	Orley George Cameron	
2	yes,		2	again because it had already been expensed and	
3	In our review of the records we		3	is listed in accounts payable.	
4	asked for documentation to support the		4	I think the issue for us, when we	
5	accounts payable and part of what we were		5	reviewed it, was the appropriateness of it	
6	given was from the accountant, actually, was		6	being listed as due to Dawley.	
7	information that \$181,000 is payable to Dalton		7	MR. TRAUB: Dalton?	
8	Management.		8	THE WITNESS: I'm sorry. To Dalton	
9	But then I later learned, and also		9	Management.	
10	confirmed by Mrs. Seavey, that was actually		10	Why do I keep mixing the two?	
11	due to the partners.		11	Q. What was inappropriate about it?	
12	Q. And if they were accounting on the		12	A. The fact that it was an invoice	
13	accrual basis in the 1990s when this money was		13	presented by another management company and	
14	accrued to Prestige, Grenadier, and Marion		14	this is now being made payable to the current	
15	Scott, money would have been expensed in those		15	management company.	
16	years; is that correct?		16	As a matter of fact, technically,	
17	A. It should have been expensed, yes.		17	number one, the fact that the tax returns, and	
18	MR. TRAUB: Objection.		18	the tax returns are prepared on an accrual	
19	A. That's the reason why it was -- for		19	basis, they are not prepared on a cash basis.	
20	it to be listed as accounts payable it means		20	They are prepared on an accrual basis.	
21	that it was expensed, yes.		21	The fact that they are prepared on	
22	Q. And if that money continues on the		22	an accrual basis and were included in	
23	books for a period of nine years and if it		23	expense -- you are shaking your head -- the	
24	were to be paid out, let's say, in 2012 to		24	tax returns I have is prepared on an accrual	
25	Dalton Management, it would be wrong to		25	basis.	

<p>1 Orley George Cameron 2 So that if they were expensed on the 3 tax return in whatever year, technically if 4 it's not paid within a certain period of time, 5 it has to be written back or written off or be 6 charged off, had to be adjusted back. That's 7 an IRS requirement. 8 A GAAP requirement is that if the 9 liability is not going to be paid to the 10 invoice, to the vendor that supplied that 11 invoice, that it has to be written off. 12 So it's not -- it's not GAAP for it 13 to be carried on the balance sheet indefinite. 14 Q. Do you know who the -- 15 A. And GAAP means not accepted by 16 accounting principle. 17 Q. Do you know who the principals of 18 Dalton Management are? 19 A. I'm not sure. 20 Q. To your knowledge, is John Edmonds 21 in any way a principal involved with Dalton 22 Management other than as a general managing 23 partner of properties that they manage? 24 He is not a principal of Dalton? 25 A. John told me he is not a part owner</p>	<p>130</p> <p>1 Orley George Cameron 2 Q. I have some followup questions about 3 what Mr. Haywoode was asking regarding the 4 invoice for, I think you just referred to it 5 as the '02 invoice that accrued in '02. 6 Then it was recorded on the 7 financial statements on the accrual basis for 8 '02, but it wasn't actually paid until '06. 9 A. Is that what my response was? 10 Q. I want to clarify that. I wasn't 11 sure what your response was. 12 A. My response was that there was an 13 invoice that was dated in '02 but was expensed 14 in '06. It was paid and expensed in '06. And 15 I'm saying that it's clearly improper, because 16 if it was an '02 invoice, if it was not paid, 17 it should have been accrued. 18 MR. HAYWOODE: Do you know -- 19 MR. KELLY: Let me finish. 20 Q. How many times was that invoice 21 actually paid? 22 A. I have no way of knowing. 23 Q. Do you know if that invoice was 24 actually paid? 25 A. In '06, yes.</p>
<p>131</p> <p>1 Orley George Cameron 2 of Dalton Management. 3 Q. To your knowledge, is Nealle Seavey 4 a member of Dalton Management, to your 5 knowledge? 6 A. To my knowledge, frankly, I'm not 7 sure who the owners, the principal of Dalton 8 Management are. 9 I know Ron is the CEO. 10 Q. Indicating Mr. Dawley? 11 A. Mr. Dawley. 12 I don't know who the owners are. 13 Q. You have no knowledge as to whether 14 Phyllis or Robert Seavey are members of Dalton 15 Management? 16 A. I think not knowledge that I can 17 verify, but I think by in discussion, yes, I 18 have, yes. They are the principals. 19 MR. HAYWOODE: That's all. 20 MR. KELLY: I have just a clarifying 21 question from what Mr. Haywoode asked 22 regarding the '02 invoice. 23 THE WITNESS: Which one? 24 EXAMINATION 25 BY MR. KELLY:</p>	<p>133</p> <p>1 Orley George Cameron 2 Q. It was paid in '06? 3 A. Yes. 4 Q. Do you know if it was paid in '02, 5 as well? 6 A. I do not know. 7 Q. So as far as you know it was only 8 paid once? 9 A. It was paid in '06, as far as I 10 know. 11 Q. And whether it was properly recorded 12 as an expense in '02 or '06, that's just an 13 accounting column to put it in, it's not a 14 misappropriation of funds; correct? 15 A. Well, it was also a misstatement of 16 the report, especially given the fact that 17 it's the auditor's invoice. 18 Q. Do you know the amount of that 19 invoice? 20 A. The invoice, I think the amount that 21 was paid from that invoice, the total invoice 22 is exceeding 100,000, but the balance that was 23 paid -- I know the balance that was paid in 24 '06 was 15,000. 25 Q. 15,000?</p>

<p style="text-align: right;">134</p> <p>1 Orley George Cameron 2 A. The total amount of the invoice, I 3 don't know. 4 Q. When conducting an audit, does the 5 auditor determine a level of materiality for 6 transactions? 7 A. Yes. 8 Q. Do you know what the level of 9 materiality for transactions were for the 10 audit of this entity? 11 A. Each auditor determines their own 12 level of materiality. 13 Q. Do you know what the level of 14 materiality was that Marks Paneth & Shron as 15 auditors determined for this entity? 16 A. No. 17 Q. So do you know if this payment in 18 2006 was above or below that level of 19 materiality? 20 A. I would not know, but given the fact 21 that amount was adjusted -- I mean materiality 22 is what you use as a gauge to determine the 23 extent of your audit or if there is a 24 misstatement, whether or not you are going to 25 consider it serious.</p>	<p style="text-align: right;">136</p> <p>1 Orley George Cameron 2 -- 3 A. 181. 4 Q. -- 181 payable to a previous 5 management company, and you had testified that 6 it shouldn't be on the books for this long. 7 A. Right. 8 Q. What would happen -- 9 MR. KELLY: Strike that. 10 Q. If you wrote that payment off the 11 books, would that result in an income to -- 12 taxable income to the entity? 13 A. Yes. 14 Q. And by keeping it on the books, you 15 are avoiding having to report that taxable 16 income or claim that taxable income; correct? 17 A. Yes. Be careful with the term you 18 use. 19 Q. I am using layman's terms at this 20 point, not technical accounting terms. 21 So if that payment were to be made, 22 it would cause taxable income to the entity? 23 MR. HAYWOOD: I assume you mean 24 Dalton Management? 25 A. If the payment were to be made?</p>
<p style="text-align: right;">135</p> <p>1 Orley George Cameron 2 However, when you are aware of -- 3 when you are aware of, it doesn't matter if 4 it's a penny, if you are aware of a 5 misstatement you have a duty, too. You cannot 6 shun that based on materiality. You have 7 to -- I mean you have to address it. 8 And that invoice -- those payments 9 were reclassified from accounting to management 10 consulting. 11 Q. Do you know what sources were 12 provided in connection with that 13 reclassification? 14 A. Well, actually it's a whole variety 15 of services, including auditing, management 16 consulting, it was a very detailed bill, phone 17 calls, conversation. It was very detailed. 18 Q. So that some of the items on that 19 bill relating to management consulting would 20 justify reclassifying part of that invoice to 21 management consulting duties? 22 A. It would, yes, but it would also 23 need to be reclassified to the prior period. 24 Q. Another topic Mr. Haywoode asked you 25 about included the \$191,000 that Mr. Edmonds</p>	<p style="text-align: right;">137</p> <p>1 Orley George Cameron 2 Q. The partnership has it on the books 3 as an expense that has already been paid; 4 correct? 5 A. That had been accrued. 6 Q. That had already been accrued. 7 If that expense is written off, that 8 would count as income to the partnership; 9 correct? 10 A. Yes. 11 MR. TRAUB: Can you clarify that? 12 Q. To Logan Partnership? 13 A. Yes. 14 Q. If Logan Partnership has to report 15 181,000 in additional income, it would have to 16 pay taxes on that additional income; correct? 17 A. The partners would. 18 Q. Partners would? 19 A. Um-hum. 20 Q. So if this amount was written off, 21 then the partners would have to report income 22 in relation to that 181,000; correct? 23 A. Um-hum, yes. 24 Q. And the partnership I am referring 25 to is Logan?</p>

35 (Pages 134 to 137)

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	138		140
1	Orley George Cameron	1	Orley George Cameron
2	A. Logan, yes.	2	A. Did we have a discussion about
3	Q. The money, no matter who it's paid	3	that? I'm not sure.
4	to, would have to be recaptured -- that's the	4	I think Mr. Seavey told me it
5	term -- as income --	5	belongs to the partners.
6	A. Right.	6	Q. Has Mr. Edmonds ever told you that
7	Q. -- to Logan Partnership?	7	half of that belongs to him?
8	A. Partnership.	8	A. No. We have never had such
9	Q. Whoever received that money would	9	discussion, no.
10	also have to pay income tax depending on the	10	MR. TRAUB: I have nothing
11	personal situation on that as income?	11	further.
12	A. Yes.	12	EXAMINATION
13	MR. KELLY: I have no further	13	BY MR. HAYWOOD:
14	questions.	14	Q. Mr. Cameron, if another ten years
15	EXAMINATION	15	went by and the current party has moved to
16	BY MR. TRAUB:	16	another jurisdiction, something like that,
17	Q. Mr. Haywoode had asked you a bunch	17	this money would still be on the books payable
18	of hypotheticals regarding books and records	18	to Dalton Management; is that correct?
19	that are kept on an appreciated basis.	19	A. I am not speaking of the prophecies.
20	A. On an accrual basis.	20	Q. The hypothetical.
21	Q. I'm sorry. On an accrual basis.	21	A. That's prophesying.
22	Isn't it true that the books and	22	MR. TRAUB: He wasn't finished with
23	records of the partnership are kept on a cash	23	his answer.
24	basis?	24	A. The fact that it is from my
25	A. They're kept on a cash basis, but	25	information it has been on the books prior to
	139		141
1	Orley George Cameron	1	Orley George Cameron
2	the accruals are carried back -- the accruals	2	the year 2000.
3	are entered in by the accountant each year in	3	I'm saying based on all standards,
4	order to adjust it.	4	GAAP and IRS standards, it should not be.
5	Q. By the auditors Marks Paneth &	5	One of the major problems, it was
6	Shron?	6	renamed. The vendor was renamed. I mean, a
7	A. By the auditors Marks Paneth &	7	vendor supplied an invoice and the invoice is
8	Shron.	8	accrued. So that if that vendor is entered
9	Q. But they are kept on a cash basis?	9	to the invoice, it remains in the vendor's
10	A. The books are kept on a cash basis,	10	name.
11	right.	11	If it doesn't, if the vendor is not
12	Q. I just want to be clear:	12	entitled to the invoice and it is so
13	With regard to the \$181,000 that we	13	determined, then it has to be written back.
14	have all been discussing over the last few	14	I mean, that's what my profession
15	minutes, that has not been paid to anyone; is	15	tells me how to treat that.
16	that correct?	16	Q. And if I carry it for ten more years
17	A. No.	17	in the name of Dalton Management, ten years
18	Q. The Seaveys have not been paid any	18	from now, what would stop me from expensing
19	money from that \$181,000, as far as you know?	19	that money a second time to Dalton
20	A. As far as '06.	20	Management?
21	Q. And Dalton Management has not been	21	MR. KELLY: Objection.
22	paid that \$181,000?	22	MR. TRAUB: Objection.
23	A. As far as '06, yes.	23	A. Well, I'm not a prophet, but if you
24	Q. Has Mr. Edmonds ever told you that	24	notice in our management comment, we adjust
25	he is laying claim to half of that \$181,000?	25	that. The fact that if it doesn't belong, it

36 (Pages 138 to 141)

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<p style="text-align: right;">142</p> <p>1 Orley George Cameron 2 has to be labeled to who it belongs, and if 3 it's not it should be written off. 4 Q. With regard to related parties and 5 materiality, if monies are paid, say to Dalton 6 Management, and if Dalton Management is an 7 organization owned or controlled by the Seavey 8 group or members of the family, should there 9 be any particular attention paid by the 10 auditor to transactions in the partnership 11 between related parties? 12 MR. KELLY: Objection. 13 MR. TRAUB: Objection. 14 A. Related party transaction? 15 Q. Yes. 16 A. Related party transactions are 17 required to be disclosed. Related party 18 transactions cannot be not disclosed on the 19 basis that it's immaterial. 20 Q. If a note was taken by any 21 individual, by any of the managing general 22 partners or a note payable to that general 23 managing partner at any time, should that be 24 material regardless of the amount of the 25 note?</p>	<p style="text-align: right;">144</p> <p>1 Orley George Cameron 2 MR. KELLY: Objection. 3 Q. As to documentation? 4 MR. TRAUB: Objection. 5 A. I cannot agree because the standard 6 would not permit me to agree with that. 7 The standard requires that related 8 party transactions be disclosed. 9 Q. Are you aware of how many 10 developments owned by the Seavey group 11 maintain the management of the Dalton 12 company and the auditing services of Marks 13 Paneth & Shron, other than the four 14 developments that John Edmonds is involved 15 in? Are you aware of how many of those? 16 MR. TRAUB: Objection. 17 MR. KELLY: Objection. 18 A. Based on the allocation that we 19 received, I would assume -- not assume. 20 Based on the salary allocation that 21 we received, there are about twelve companies 22 that are managed by Dalton Management. 23 How many of them are audited by 24 Marks Paneth & Shron, I don't know. 25 MR. HAYWOOD: I have nothing</p>
<p style="text-align: right;">143</p> <p>1 Orley George Cameron 2 MR. TRAUB: Objection. 3 A. It may or may not be material, but 4 it must be disclosed, the nature of that, the 5 nature of that loan and, what do you call it, 6 the terms of the note are required to be 7 disclosed in their footnotes to the financial 8 statement. 9 Q. There was a note for \$29,000 that 10 you came across, and I believe you testified 11 about it a few seconds ago, and the issue was 12 put to Mr. Jennings concerning the backup and 13 support of that \$29,000; is that correct? 14 MR. TRAUB: Objection, compound. 15 MR. KELLY: Objection. 16 A. I know Mr. Jennings had addressed it 17 in his testimony, yes. 18 Q. Do you recall his answer was that it 19 was beneath the level of materiality? 20 A. Yes. 21 MR. KELLY: Objection. 22 Q. Do you agree with that analysis of 23 Mr. Jennings, that a \$29,000 loan payable to a 24 managing general partner would be beneath the 25 level of materiality?</p>	<p style="text-align: right;">145</p> <p>1 Orley George Cameron 2 further. 3 MR. KELLY: I have nothing. 4 MR. TRAUB: I have nothing. 5 MR. KELLY: Okay. 6 (Time noted: 1:20 p.m.)</p>

37 (Pages 142 to 145)

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<p>146</p> <p>1 Orley George Cameron</p> <p>2</p> <p>3</p> <p>4 ACKNOWLEDGMENT</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9 I, ORLEY GEORGE CAMERON, hereby 10 certify that I have read the transcript 11 of my testimony taken under oath on the 12 21st day of April, 2009, that the 13 transcript is a true, complete and 14 correct record of what was asked, 15 answered, and said during the deposition, 16 and that the answers on the record as 17 given by me are true and correct.</p> <p>18</p> <p>19</p> <p>20 ORLEY GEORGE CAMERON</p> <p>21 Signed and subscribed to before me 22 this ____ day of _____, 2009.</p> <p>23</p> <p>24</p> <p>25 Notary Public</p>	<p>148</p> <p>1 INDEX</p> <p>2</p> <p>3 WITNESS EXAMINED BY PAGE</p> <p>4 ORLEY GEORGE CAMERON (Mr. Kelly) 4</p> <p>5 116</p> <p>6 131</p> <p>7 (Mr. Traub) 91</p> <p>8 120</p> <p>9 138</p> <p>10 (Mr. Haywoode) 111</p> <p>11 123</p> <p>12 140</p> <p>13 EXHIBITS</p> <p>14 DEFENDANTS' PAGE</p> <p>15 FOR IDENTIFICATION</p> <p>16 Exhibit 13 Copy of Subpoena issued 17 to Orly Cameron (sic), 5</p> <p>18 Exhibit 14 Document entitled 19 "Independent Auditors' 20 Report," 32</p> <p>21 Exhibit 15 Copy of document on the 22 letterhead of Cameron, 23 Griffiths & Pryce, to 24 Mr. John Edmonds, 39</p> <p>25 Exhibit 16 Copy of Affidavit of Orley G. Cameron, 47</p> <p>26 Exhibit 17 Copy of document on the 27 letterhead of Internal 28 Revenue Service, Department 29 of the Treasury, dated 30 October 26, 2006. 78</p>																																																																																
<p>147</p> <p>1</p> <p>2</p> <p>3 STATE OF NEW YORK) 4) ss: 5 COUNTY OF NEW YORK)</p> <p>6</p> <p>7 I, DONNA A. METZ, R.P.R., a Notary 8 Public in and for the County of New York and 9 State of New York, do hereby certify: 10 That I reported the proceedings in 11 the within entitled matter, and that the 12 within transcript is a true record of such 13 proceedings. 14 I further certify that I am not 15 related by blood or marriage to any of the 16 parties in this matter and that I am in no way 17 interested in the outcome of this matter. 18 IN WITNESS WHEREOF, I have hereunto 19 set my hand this 28th day of April, 2009.</p> <p>20</p> <p>21</p> <p>22 DONNA A. METZ, R.P.R. 23 Notary Public</p> <p>24</p> <p>25</p>	<p>149</p> <p>1</p> <p>2</p> <p>3 ERRATA SHEET</p> <p>4 CASE NAME: EDMONDS et al. vs SEAVEY et al. 5 DEPOSITION DATE: April 21, 2009 6 NAME OF WITNESS: ORLEY GEORGE CAMERON</p> <p>7 CHANGES</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>PAGE</th> <th>LINE</th> <th>FROM</th> <th>TO</th> </tr> </thead> <tbody> <tr><td>1</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>2</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>3</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>4</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>5</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>6</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>7</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>8</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>9</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>10</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>11</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>12</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>13</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>14</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>15</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>16</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>17</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>18</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>19</td><td>1</td><td>1</td><td>1</td></tr> </tbody> </table> <p>20 ORLEY GEORGE CAMERON</p> <p>21 Subscribed and sworn to before me 22 this ____ day of _____, 2009. 23</p> <p>24 (Notary Public) (commission expires)</p> <p>25</p>	PAGE	LINE	FROM	TO	1	1	1	1	2	1	1	1	3	1	1	1	4	1	1	1	5	1	1	1	6	1	1	1	7	1	1	1	8	1	1	1	9	1	1	1	10	1	1	1	11	1	1	1	12	1	1	1	13	1	1	1	14	1	1	1	15	1	1	1	16	1	1	1	17	1	1	1	18	1	1	1	19	1	1	1
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38 (Pages 146 to 149)

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A			
able 29:7 41:7 50:20 100:22 101:2 117:13 118:19	62:5,15 123:15 124:2 125:13 127:13 129:18,20 129:22,24 132:7 138:20,21	admissible 88:22 advised 106:18 111:15	122:16 125:23 128:18 133:18,20 134:2,21 137:20 142:24
accept 115:2	accruals 139:2,2	affidavit 47:7,16,20 49:6,14 51:2,6,8 89:19 148:19	amounts 92:25 100:7 119:18 120:21,24 123:3,4 123:8
accepted 21:7 28:11 68:15,20,25 72:11 95:25 130:15	accrued 61:14 122:14 123:16	affidavits 104:8	analysis 75:16 143:22
account 26:23 27:5 29:13,14,16,22,24 30:4,7,11,15,15 34:16,19,20 35:3 35:13 51:23 55:6 61:5 83:13,15,16 83:17 84:7 92:23 110:12	127:14 128:9 132:5,17 137:5,6 141:8	agencies 15:19,22 15:24,25 16:2,3,6 18:3,5,5 95:3,6	analytic 26:7 and/or 55:5 annual 29:8,9 answer 4:19,21 5:9
accountant 57:20 59:15 60:13 69:25 124:8,25 127:6 139:3	accuracy 112:16	agency 51:23 80:15 80:15	34:2 38:5,24 50:7 53:21 57:9 59:23 64:6,8,10 71:16
accountants 70:5,9 70:11	accurate 114:14,20 121:12,16	agent 49:2 51:11 52:17,23,25	73:21 76:12 88:24 92:4 98:24 102:2 103:18 104:17
accountant's 70:17 71:12	action 4:11 33:21	agent's 48:19	109:11,12 123:24 124:6,9,12,19,20 125:6 140:23 143:18
accounting 14:23 17:3 20:4 26:7 30:21 31:12 36:15 36:16 37:5 54:8,11 55:5 57:16 61:2 69:11 72:2,8 75:22 93:5 96:2 106:23 124:16,23 125:3 127:12 130:16 133:13 135:9 136:20	actual 121:19	ago 14:10 23:16 91:4 143:11	answered 38:16,23 53:12 108:4 113:8 146:15
accounts 30:22 31:22,22,24 32:3 34:13,15,23 35:5,7 35:13 61:12 62:10 62:11 95:12,12 109:19 127:5,20 129:3	additional 11:19,20 66:15 70:23 71:14 93:21 100:21,25 105:3 107:17 111:6 137:15,16	agreement 28:2,5 48:19 49:9,13 54:4 54:7 63:13 65:17	answering 118:25 answers 97:6 146:16
accrual 35:4 36:20 36:21 61:19,24	address 135:7	al 1:5,8 4:13 149:3,3	anticipate 8:16 10:23 11:18,23 12:10 102:16,18 102:19
	addressed 44:9 143:16	allocation 144:18,20	anticipated 10:12 11:5
	adjust 55:5 62:10,11 62:13,14 139:4 141:24	allocations 52:8	anybody 7:4 58:21 84:9 85:3,7 86:16
	adjusted 80:8 122:20 130:6 134:21	allow 39:3	apartment 18:8,12
	adjusting 54:9,20 55:10 58:11 59:7 59:18 60:12,15 62:6,17 100:15 110:10	allowed 46:11	apparently 77:16
	adjustments 35:14	Amendment 72:3 72:15	appearance 6:22 73:4
		amortization 120:7	appeared 125:21
		amortized 64:15 65:4,9,10 105:11 105:17,21,22 106:3	appearing 86:14
		amount 8:15 9:12 9:16 11:4,16,25 12:2 32:9 60:2,4 64:22,25 71:8 74:3 75:11 77:18 78:10 100:8,10 112:13 113:16 118:6 119:11,12,13	applicable 51:16

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86:23,25	115:21 125:5	80:6 86:21,22	avoiding 136:15
appreciate 56:14	132:3	92:16,17,18,20,21	aware 72:19 74:11
appreciated 138:19	aspect 88:21	93:6,8,20 95:8	77:12 85:8 114:7
approach 88:25	aspects 25:20	102:25 103:6,11	114:12 135:2,3,4
approached 88:19	assert 50:21	103:14,21 104:6	144:9,15
92:13	asserted 50:15	105:24 106:4	a.m 1:12 82:12
appropriate 9:13	assessment 8:11	108:16 134:4,10	
61:7,8,9,15 81:12	34:5,9	134:23	B
119:17,20,21,23	assessments 51:18	audited 9:7 15:19	B 2:8,9 148:10
appropriateness	assist 5:5 70:18	16:3 23:10 61:20	bachelor's 14:18
129:5	assisted 18:23	61:23 74:6 144:23	back 12:13 35:2
approved 59:9	associates 40:19	auditee 69:15 70:15	65:18 89:18 90:24
71:15	77:13 78:6	auditing 19:17,19	103:3 113:23
approximate 9:21	assume 4:20 74:18	19:23 20:4 21:9	130:5,6 139:2
approximately 10:6	136:23 144:19,19	28:11 67:13,15,19	141:13
10:9,10,25 11:7,12	Assumes 113:2	68:16,20,25 69:12	backup 120:18
12:4,5,6 13:2,2	assuming 106:2	72:9,10,12 105:25	143:12
16:18 71:11 99:19	112:7,15,21	108:24 110:14	balance 26:6,10
106:17 112:4	astronomical 74:22	135:15 144:12	28:20,25 29:4,13
123:7	attached 48:8	auditor 15:4,5,16	29:14,16,19,23,25
April 1:11 83:23	attend 14:11,14	59:16,17 66:11	30:16,19,20 31:5,8
105:14 146:12	attention 47:19	69:15 70:24 73:2,5	31:15 34:11,12,20
147:18 149:3	142:9	73:10 105:24	34:22 60:12 83:18
arbitrary 65:11	attorney 2:4 5:6	122:11 134:5,11	119:13 130:13
argue 81:13	88:10,16 89:3,8	142:10	133:22,23
arguendo 112:7	attorneys 2:8,16 3:7	auditors 32:22	balances 26:13 55:6
argumentative 56:3	108:8 116:12,17	33:14,18 40:11	bank 28:19,25 31:14
arises 76:25	attributable 112:18	58:17 59:12 92:19	bar 81:19
arm's 69:14	attributed 126:20	134:15 139:5,7	based 8:2,8,10 9:4,5
arrange 5:13	audit 12:22 15:17	148:15	27:7,9 98:25,25
articulate 27:16	15:22,25 16:3,4	auditor's 59:7 69:10	105:7 135:6 141:3
aside 56:24	17:17 18:3,7,11,15	71:4 104:12	144:18,20
asked 13:18 28:18	18:19 20:7,12,16	108:15 133:17	basic 29:24 30:20
32:25 34:3 38:16	20:20 21:3 22:14	audits 17:13,14,15	52:6 55:4 72:25,25
38:23 53:22 58:15	25:16,22,22 26:4	17:16,20,25 23:8	basically 16:5 27:17
65:25 89:7 103:5	28:10 29:6,25	31:18 59:14	28:9 62:8 74:12
103:13,19,20	35:20 36:6 37:20	105:21	77:8
116:6 117:5 119:4	41:25 42:17 43:21	August 16:23,25	basis 9:9 30:15
127:4 131:21	45:3 49:10 54:15	automatically 31:12	34:14 35:4,9 36:15
135:24 138:17	59:16 66:16,18	available 36:4 41:3	36:16,19,20,21,25
146:14	75:8,11,16,24	100:4,16	37:4,8,8,11 52:8
asking 43:4 55:13	76:18,24,25 77:4	Avenue 1:19 2:10	61:18,19,19,24
56:6 58:19,19	77:14,22 78:7,13	average 112:8	62:2,4,5,15,15
92:10 107:2,24	79:10,13,15,18	Avery 2:8	112:8 123:16,23
			124:2 125:13

127:13 129:19,19 129:20,22,25 132:7 138:19,20 138:21,24,25 139:9,10 142:19 bat 73:17 becoming 14:12 began 25:25 104:6 beginning 8:4 103:11 believe 24:14 41:6 90:18 91:5 108:12 115:14,24 126:4 126:19 143:10 believed 126:15 belong 141:25 belongs 140:5,7 142:2 beneath 143:19,24 benefits 51:12 better 80:16 81:20 beyond 98:11 bill 4:10 7:24 8:2,6,9 8:20 9:3 10:15 11:13 37:8,12,17 42:23 108:2 109:3 135:16,19 billed 8:22 12:12 billing 6:13 8:8 12:10 37:18 bit 106:15 blood 147:14 board 126:22 book 20:3 37:2 81:3 87:9 booked 110:11 bookkeeping 46:15 48:20 51:14 books 58:23 70:14 100:3 101:25 102:4,5,7 103:8,21 121:18 122:4 123:9,15,22 127:23 136:6,11	broken 30:14 brokers 18:4 Brooklyn 2:5 14:15 14:17,19,25 15:3 19:8,9,10 brought 4:12 6:3 21:18 94:20 114:8 114:10,23 115:12 budget 8:3 building 18:25 bunch 138:17 business 96:25 <hr/> C C 2:2 4:3 146:4 149:5 calculation 112:6 call 33:11 35:6 40:4 45:20 63:21,25 64:4,7 70:21,23 84:14,18 85:9 93:8 100:20 143:5 called 7:6 13:16,18 16:17 17:2 54:9 63:20,22 calls 128:4 135:17 Cameron 1:16 4:9 5:1,17,19,21 6:1,4 7:1,13,15 8:1 9:1 10:1 11:1 12:1,17 13:1 14:1 15:1 16:1 17:1,3,5,11	18:1 19:1 20:1,6,7 20:12,16,20 21:1 21:16,22 22:1,2,4 22:8,16 23:1,7,14 23:17 24:1,2,8,15 24:19 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1,20 40:1,18,24 41:1,6,18 42:1,25 43:1 44:1 45:1 46:1 47:1,8 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1 63:1 64:1 65:1 66:1,9 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1 82:1 83:1 84:1,10 85:1,16,20 86:1 87:1 88:1,15 89:1 90:1 91:1,19 92:1 93:1,12,14 94:1 95:1 96:1,4,10,13 96:16,17,19 97:1 97:11,14,20 98:1 98:19 99:1,17 100:1 101:1 102:1 103:1 104:1 105:1 106:1 107:1,14 108:1,18 109:1,4 110:1 111:1,12 112:1 113:1 114:1 115:1 116:1,6 117:1,24 118:1 119:1 120:1 121:1 122:1,25 123:1	124:1 125:1 126:1 127:1 128:1 129:1 130:1 131:1 132:1 133:1 134:1 135:1 136:1 137:1 138:1 139:1 140:1,14 141:1 142:1 143:1 144:1 145:1 146:1 146:9,20 148:4,13 148:17,19 149:4 149:20 capital 95:12 96:18 96:22 capitalized 106:4 121:4 cards 96:25 careful 136:17 Carolina 13:16 carried 130:13 139:2 carry 141:16 case 1:7 6:22 8:23 47:17 76:9 149:3 cash 26:5 34:14,24 35:6,7,9,10,11 36:15,16,17,19,22 36:25 37:2,7,8,11 61:18 62:2,4,15 75:16 106:10 123:22 129:19 138:23,25 139:9 139:10 cause 136:22 caution 88:23 cc'd 44:14,21 cc's 44:13 central 45:24 46:21 52:14 CEO 35:18 131:9 certain 107:18 130:4 certify 146:10 147:8 147:13 cetera 26:5
--	--	---	---

chance 108:11	77:8 132:15	companies 17:18 18:19 59:14 144:21	concern 26:19,19 27:17 36:13 68:6 69:6 77:7 93:3 105:18
Chancellery 2:5	clerical 48:20 51:13	company 2:9 17:4,5 17:11 44:13 46:6	concerned 92:24
change 56:4 79:16 79:17 80:4 81:25	clerks 46:16	46:23 96:14 110:15 112:2	concerning 143:12
changed 39:14	client 8:2,19 23:18 24:15 97:10	126:22 129:13,15 136:5 144:12	concerns 27:13,14 27:15 38:7,9,10 61:17
changes 90:23 91:2	clients 7:24 8:14,20 12:22 23:22 24:5 37:17	company's 46:24 compared 25:19 69:6 83:19	concludes 39:7 conclusion 5:11 36:11 37:22 128:5
changing 92:19	closing 29:16 105:10 105:11,12,17 106:5	compensated 68:9 compensation 51:11 51:20 52:3 67:24	conclusions 36:7
characterization 109:20	collaborate 22:13	competent 30:20 31:12	conducted 105:12 conducting 36:6 43:20 134:4
characterize 60:16 65:13	colleague 13:17	complaints 104:7 complete 95:7 146:13	conference 63:21,25 64:4,7 84:14 85:9
charge 66:20	collect 35:10 37:12	completing 14:24 completion 19:7	confirm 38:25
charged 11:10,16 66:12,17 75:7,11 75:17,19 76:4 130:6	college 14:11,14,15 14:17,19,25 15:3 19:9,10	complexes 18:8,12 compliance 94:17 95:16	confirmation 9:11 confirmed 50:18,21 127:10
charging 11:18 12:21	column 133:13	compliant 80:19 complicated 37:15	conflict 76:23,24 94:18
Charles 9:24 21:6 98:19	come 5:10 9:12 13:13 34:9 36:11 57:12	comply 92:19,20 component 74:5 components 75:15 75:17	connection 5:22 6:10,14 11:11 12:25 13:23 19:12 19:16,19,23 21:9 24:2 31:17 32:15 33:5,9,20 42:9 48:6 50:10 54:17 54:21 55:11 58:24
choice 77:2	comes 59:16	compound 121:22 143:14	63:6 76:17 77:21
chronological 30:8 30:10	comfortable 56:13	compounded 121:21	78:7,13 82:15,16 117:4,17,21 135:12
Church 9:24 10:7,9 10:18,24 11:4 21:6 97:24	coming 13:21 61:10	comprehend 55:14 57:11	consider 134:25
churches 18:4	comment 33:12 38:10,11 109:18 141:24	compromise 65:22 75:24 76:5 77:10	considered 52:3
city 16:11 119:8	commentary 107:19 108:15	compromises 105:23	constitute 108:13,19
civil 6:22	comments 39:2 40:5 40:8,13 41:20	computer 90:24	constituting 108:14
claim 114:10 115:4 136:16 139:25	commission 149:23	computers 112:5	consulting 17:13 61:2 135:10,16,19 135:21
claimed 99:20	common 59:17	conceptually 57:14	consuming 31:9,10
clarify 97:5 98:23 124:7 132:10 137:11	communicate 42:14 43:19		
clarifying 131:20	communicated 42:16 58:16 67:3,6		
clause 49:23	communication 41:22 42:5,19,22 44:12,13		
clear 55:2 107:23 110:8 115:24 118:22 119:3 139:12	communications 43:15,22 44:4,7,20 84:11 86:11		
clearly 16:21 46:18 46:25 54:7,18 71:12 72:5 76:22			

contacted 28:15 85:18 93:18	38:25	cover 111:17 covered 75:21	105:8,9 121:3,10 121:24 122:19
contained 29:18,19 31:5 108:17	conveyed 38:8,9,9 copies 44:3 59:4	CPA 13:17 14:4,12 22:24 23:2,3	132:13 148:22 Dawley 2:9,23 28:16
contemplated 103:10	copy 5:18 28:4 39:19 42:18 47:7 49:9,13 78:20 90:4	CPAs 23:5 create 30:2,15 31:11	50:9 51:3 67:5 70:3 91:22 109:25
contemplation 88:11	148:13,16,19,20	created 117:21 credit 18:3 34:17,20	126:4,19,25 128:14 129:6
contending 52:6	Corporation 111:13 111:19	34:22,23,25 35:4,6 credits 19:21	131:10,11 day 146:12,22
context 68:16,21 69:16 79:18	correct 8:14,21,24 10:11 23:23 24:16	35:10 cumulative 110:20	147:18 149:22 de 70:22 71:21,25
continued 14:20 83:21,22,24	24:17,21 25:2 28:6	current 16:13 61:11 115:9 118:6 119:9	72:20,23 73:13 74:4,7 76:21 77:8
continues 127:22	40:9 44:24 49:8,11	122:22 129:14	77:22,25 78:4
continuing 119:2	55:6 62:2 66:18,19	140:15	dealing 124:17
contract 45:18,19 46:2,4,5,7,11,18 46:21 49:23 51:9	66:22,23 97:11,12 101:22 104:15	currently 12:14	debit 34:21,23 35:2
52:20 53:3,17 66:13,22 70:21	112:3,25 115:5,7	17:25 20:10 94:22	35:4,7,10 83:18
71:6,7,7 75:4,5,10 75:14,21 76:11,13	120:10,11 123:10	cut 44:16	debits 34:16
contracts 71:10	123:17,19 124:4	D	debit-credit 35:12
contradiction 50:23	125:19,25 127:16	D 146:4 148:2	December 27:6
contravention 54:4	133:14 136:16	Dalton 2:9 6:5 26:14	83:19,21
contributions 96:18 96:22	137:4,9,16,22	26:15 44:22 47:25	decision 81:25
control 34:6 57:25 106:22	139:16 140:18	53:7,24,25 54:16	deducted 125:17,22
controlled 142:7	143:13 146:14,17	54:21 55:11,15	defendant 2:16 4:11
controller 16:10 22:19,21 24:12	correction 35:14 115:3	58:8,23 59:21 60:2	114:18,24 115:15
94:22	correctly 23:20	60:8 62:2 67:16,17	defendants 1:9 2:8
Controller's 15:8,11 15:15 16:8	correspondence 6:4	67:19,21 69:24	5:17,19 32:23
controls 33:22 95:18	cost 105:11	91:22 101:19	39:22 47:8 78:23
conversation 63:6 63:24 116:11,13	costs 48:23	107:14 109:18	91:22 99:10,10
116:16,21 135:17	counsel 2:12,19 4:24	110:4 126:5,20,22	104:14,21 105:5
conversations 63:9 84:17,21 85:4,7	5:4 96:3 126:16	127:7,25 129:7,8	106:20 107:16
87:20,23 88:3,10	count 30:25,25	130:18,21,24	108:17 114:11,22
convert 62:4	137:8	131:2,4,7,14	115:17,17 148:11
convey 37:25 38:19	County 147:4,7	136:24 139:21	deficit 113:10,11,12
	couple 6:3 80:12	140:18 141:17,19	113:18
	97:6	142:5,6 144:11,22	define 46:13
	courses 19:12,16,23	Dalton's 50:18	definition 56:25
	20:2	Darren 2:12 80:11	72:13
	court 1:3 3:13 5:16	91:12,20 124:20	degree 14:16,16,18
	32:19 39:17 47:5	date 5:20 32:24	14:22 15:5
	78:18 80:18,21,22	39:23 47:10 78:24	delineate 69:13
	109:11	97:9 149:3	delineation 46:19
	courtesy 91:25	dated 78:22 103:25	delivered 40:19

Deloitte 23:12	37:20 60:9,22	86:15 89:5	draft 89:25 90:5,21
Department 15:6	difficulties 43:20	displayed 121:7	drafts 104:7
78:21 119:7,8	62:18	dispute 65:12 66:2,5	Drive 2:17
148:21	difficulty 31:9 42:16	disputes 65:14,15	due 35:17 95:23
depend 112:5	direct 47:19	distributed 110:3,17	126:15 127:11
depending 138:10	directed 6:6	110:19	129:6
deposition 1:16 3:9	directly 101:10,12	distribution 26:23	duly 4:4
62:24 63:2 86:15	102:11	27:4,5,19,21 83:12	duties 15:14 135:21
86:16 87:18,19	director 51:16	83:15,16,17 84:2,2	duty 135:5
89:13 100:20	disagreed 50:11,13	92:23,25 109:18	dwelling 51:25
109:6 128:15	discharged 52:24	109:23 110:11,21	
146:15 149:3	disclaimer 45:6 99:5	113:25 114:4,6	E
depositions 80:14	99:9 100:6	distributions 95:13	E 2:2,2,21,21 4:3,3,3
81:5 121:8	disclosed 71:9	95:23 110:22	4:3 146:4,4 148:2
depositon 63:4	142:17,18 143:4,7	DISTRICT 1:3,3	148:10 149:2,2,2,5
depreciation 120:6	144:8	document 32:20,21	earlier 37:21 40:7
described 59:6	discover 97:14,20	33:3,14 39:19 40:3	102:13 104:11
desired 65:22	97:25 98:20	40:6 44:8 45:17	earned 36:22
destroys 71:4	discovered 49:24	48:11 78:20 79:5	East 89:14
detail 27:24 29:21	99:19 101:8	89:19 90:2,5,8,17	EDELMAN 2:15
detailed 135:16,17	106:19 107:10	90:18,22 91:3	edited 89:22 90:2
determination	discovery 100:21,24	100:4 101:14	Edmonds 1:5 4:12
97:18,23 98:4 99:3	105:7 108:15	106:8 148:14,16	7:10 8:22 9:3,5,14
determine 8:10,12	109:10 117:12	148:20	11:10,15,19 12:3,8
9:10 61:4 95:21	discrepancies 84:4	documentation	12:11,25 13:5,8,14
134:5,22	120:20	32:12 35:19	13:20 18:7,11,15
determined 134:15	discrepancy 99:20	100:14 120:19	18:19 20:11,15,19
141:13	117:6 118:7	127:4 144:3	20:25 21:22 23:18
determines 134:11	120:23	documentations	23:22 24:5,14,20
develop 25:22 26:3	discuss 47:24 86:18	69:23	24:24 25:6,10,13
26:3	86:19 111:15	documents 5:22,25	26:17,17 28:2 38:2
developments	discussed 9:4 64:23	7:5 44:22,25 45:8	38:12,20 39:21
144:10,14	86:17,20 102:23	87:2,5,11,14,15,17	40:14,25 42:9,13
DHCR 15:21 20:8	109:23 112:25	96:7,10 99:21	43:16,25 44:10,12
20:13 23:9 71:15	discussing 31:16	101:2,9,16 102:3,6	44:14,21 50:3 63:7
94:7,25	64:13 76:19	103:5,15 107:4,17	68:15,19 82:17,19
diaries 6:9	139:14	108:9,12,20 109:3	86:12 87:21 89:6
DICKER 2:15	discussion 50:2,3	dollar 11:25	92:13 95:22 96:12
difference 25:18	51:2,4,4 64:16	dollars 10:12 60:14	97:10 99:18
81:8 95:18 120:15	71:18 80:11 82:5	112:11 113:15	103:10 104:22
different 94:6 95:10	88:21 89:10,12,16	Donna 1:20 4:5	106:18 109:17
95:11 100:18	106:21 111:22	147:6,22	110:25 111:14,21
102:17 125:24	131:17 140:2,9	double 128:18	114:2,9,17 115:5
difficult 31:6 36:19	discussions 68:14,22	DOUGLAS 2:3	115:15,24 116:19
			117:2 126:14

130:20 135:25 139:24 140:6 144:14 148:18 149:3 EDMONS 2:22 educational 19:12 effect 3:13 effective 72:16 eight 10:12 either 114:2 elected 96:5 ELSER 2:15 else's 68:12 employees 17:8 48:2 50:16,18,22 51:13 51:15 52:9,10,13 52:15,17,23 53:6 53:16,19,24,25 employment 51:19 51:21 86:9 enable 39:9 engaged 9:14 12:24 20:24 26:16 engagement 6:11,14 7:10,17,22,25 8:5 8:11,13,14,16 9:2 9:3,20 10:3 11:11 11:21,22 18:6,10 18:14,18 20:11,15 20:19,25 21:2,21 24:20,23 25:5,9 27:25 28:5,8,12,14 32:15 33:5,9 42:10 68:17,21 69:16 75:6,14 78:5 82:16 85:15 86:4 93:8,16 94:11 96:15 102:24 117:21 engagements 21:7 25:13 28:21 33:21 85:21 engaging 89:2 English 26:25 enter 27:25	entered 139:3 141:8 entire 39:6 46:7 79:20 entities 15:23 17:24 18:7,11,15 19:23 20:8,13,17,21 21:4 23:9 66:11 94:6 entitled 32:21 68:8 141:12 147:10 148:14 entity 21:25 22:5 27:20 76:17 96:4 134:10,15 136:12 136:22 entries 26:23 54:9 54:12,16,20 55:4 55:10 56:23 58:3,3 58:4,6,7,8,11,12 58:17,22,25 59:3,5 59:6,7,18 60:2,4,8 60:15,17 62:7,9,14 62:17,21 63:11,14 69:22 70:8,9,11 100:15 110:11 equally 85:22 equipment 48:23 especially 75:15 133:16 ESQ 2:3,12,18 estate 13:24 119:5 estimate 7:21 8:15 9:2,7 11:7 estimated 8:3,8 estimation 27:7,9 et 1:5,8 4:13 26:5 149:3,3 evaluate 77:2 evidence 59:9 98:8 113:3 exact 64:25 72:22 112:13 exactly 49:18 113:16 EXAMINATION	4:7 81:22 82:13 91:17 111:10 116:4 120:3 123:12 125:8 131:24 138:15 140:12 examinations 17:22 examined 4:5 148:3 example 27:4,6 60:23 83:20 119:4 exceed 70:25 77:9 exceeding 133:22 exception 77:22,24 78:2,7 excess 76:4 113:15 120:13 excuse 74:18 85:5 89:6 exhibit 5:17,19 6:17 6:18 32:19,23 33:2 39:5,18,18,22,24 40:10,11,23,23 45:12 47:6,6,9,11 47:14,16 48:5,9,14 48:16 78:19,23,25 89:18,20,21 99:10 99:10 104:3,4 148:13,14,16,19 148:20 exhibits 41:13,19 104:14,21 105:5 106:20,25 108:17 exist 21:23 expand 103:13,20 expanded 102:21 expanding 102:16 expands 11:22 expansion 102:19 expect 11:23 67:22 68:13 expected 67:20 expenditures 112:24 120:13,16 expense 45:14 46:24	52:4 54:2 61:12 111:17,18 112:2 112:18,21 123:16 128:2 129:23 133:12 137:3,7 expensed 121:11,25 122:21 123:17 124:3 125:16,17 127:15,17,21 128:8,11,12,13,16 128:23,25 129:2 130:2 132:13,14 expenses 36:23 45:23 46:22 48:22 49:4 51:24 53:16 61:6 97:3 99:20 100:2,5 expensing 125:23 128:18 141:18 experience 15:9 59:15 94:10,21 expert 124:15,23 125:3 expertise 21:19 93:21 124:8 expires 149:23 explain 36:19 43:2 50:13 55:23 explanation 62:20 117:15 explore 56:25 express 39:9,9 expresses 76:23 extent 9:11 59:20,23 59:24,25 77:15,19 85:17 95:14 134:23 e-mailed 44:2
F			
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65:3 70:7 75:22 89:12 114:23 129:12,16,17,21 133:16 134:20 140:24 141:25 facts 34:8 113:3 fair 27:18 31:3 60:16,19 81:24 85:14 90:21 109:20 112:15 familiar 51:8 52:5 52:19 53:2 54:8,11 55:20,22 56:17,19 57:4 73:7 93:20 94:15 family 142:8 far 11:10 12:3,11 29:4 35:15 133:7,9 139:19,20,23 faxed 44:2 February 63:2 83:23 federal 51:17 79:23 80:3,15,22,25 81:6 81:7,9,12 fee 9:13 fees 8:19 11:19 12:2 12:16 45:21,23 60:25 66:12 73:12 75:7,9,11 76:4 Feinstein 1:18 2:7 91:21 Fifth 77:12 78:6 111:12,18 112:10 112:17 figure 74:21 100:17 118:10,11 figures 111:24 file 2:13,19 50:21 52:11 filed 80:9 96:9 files 52:14 97:13,19 97:24 98:19 filings 3:9	financial 17:15,17 17:25 21:3 26:21 26:22 28:10 31:18 39:10 45:3,6 61:14 61:19 62:5 95:17 95:20,24 102:25 110:5,14,15 122:15 132:7 143:7 find 36:8 38:21 43:12 73:18 101:2 109:15 110:22 111:2 findings 80:7 104:13 105:4 finish 50:7 92:3 132:19 finished 50:6 91:5 140:22 firm 6:4 7:13 12:18 12:19,21 75:23 84:24 91:20 94:23 firm's 75:25 first 6:9 9:14 12:24 15:5 20:24 21:12 25:12 26:2,3,6,16 28:13 39:11 42:15 53:22 83:17 85:18 92:3,13 95:20 98:24 115:4,14 116:2 five 10:6,17 fixed 77:9 flow 75:16 flows 106:10 focus 95:15,17,19,20 focused 84:6 follows 4:6 followup 132:2 footnotes 143:7 force 3:12 16:15,17 16:20 18:22 19:4 forensic 17:20 93:4 93:8,22	forget 93:21 forgetting 67:17 forgiven 64:15 form 3:17 23:4 54:23 82:22 83:2 96:3 98:12 103:16 126:10 formal 44:17 format 44:6 formation 22:4,8,16 23:7 96:19 97:9 formed 21:16 forming 23:14 96:13 forth 65:18 73:15 104:13 106:20 forward 62:22 for-profit 18:5 found 38:13 84:4 110:14 120:12,20 foundation 112:20 four 21:5,9 27:22 54:17,21 95:8 144:13 frankly 68:5 82:20 131:6 fraud 17:22 free 51:25 French 56:8,9 fringe 51:11 front 39:24 40:12 46:12 47:11 48:14 78:25 118:9 frontline 45:21 46:13,14,20 50:22 51:12 full 103:11 function 105:24 fund 16:6 funded 15:21 funding 15:21,23 16:2 95:5 funds 49:3 53:6,7 133:14 furnished 51:25	further 3:15 115:19 119:24 138:13 140:11 145:2 147:13 furtherance 28:14
G			
G 4:3,3 47:7 48:5,8 48:9,9,9,14,16 146:4 148:19 149:5 GAAP 64:19,20,21 65:3,7 130:8,12,15 141:4 GAAS 69:3 GAGAS 20:3 71:2 72:8 87:7 gain 33:21 54:14,19 54:24 55:3,9,18,20 55:24 56:7,8,17,20 56:25 57:5,10,15 57:18,24 58:2,5,10 Gannett 2:17 GAO 69:7,10 gauge 134:22 general 29:5,8,10,12 29:15,20,21 30:3 30:13,23 31:5,7,15 31:25 32:4,7,13 60:17 87:3,13 106:21 114:3 119:14 120:22 128:17 130:22 142:21,22 143:24 generally 7:20 8:2 28:11 35:15 57:23 68:15,20,25 72:11 95:25 112:5 generated 24:18,19 112:17 gentleman 13:20 George 1:16 5:1 6:1 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1			

17:1 18:1 19:1	149:4,20	23:17,24 24:2,8,15	110:6 111:7,11
20:1 21:1 22:1	getting 26:20 27:18	24:19 25:5 39:20	113:5 114:19
23:1 24:1 25:1	42:17 93:2 95:22	40:24 66:9 84:10	115:2,11,18,21
26:1 27:1 28:1	102:16	84:16 85:6,16,20	116:3,14,18,25
29:1 30:1 31:1	give 91:25 92:3	86:10 88:16 93:12	117:2 118:24
32:1 33:1 34:1	107:8 108:11	93:14 96:4,10,13	119:19 121:14
35:1 36:1 37:1	given 41:4 61:23	96:16,18,19 97:11	123:13,21,24
38:1 39:1 40:1	100:21,25 106:25	97:14,20 98:20	124:11,12,17
41:1 42:1 43:1	127:6 133:16	99:17 107:14	125:4,5,9 126:16
44:1 45:1 46:1	134:20 146:17	109:4 117:24	131:19,21 132:3
47:1 48:1 49:1	giving 104:13	148:17	132:18 135:24
50:1 51:1 52:1	go 12:13 14:2 63:10	gross 112:9,12	136:23 138:17
53:1 54:1 55:1	63:14 88:5 91:10	group 142:8 144:10	140:13 144:25
56:1 57:1 58:1	91:11 113:23	guidance 73:22 74:2	148:8
59:1 60:1 61:1	119:12	74:12	Haywoode's 90:23
62:1 63:1 64:1	God 31:20	H	head 129:23
65:1 66:1 67:1	goes 58:15 98:10	H 148:10 149:2,5	hear 4:16 10:16
68:1 69:1 70:1	going 4:14 5:15 6:16	half 9:9,10 16:18	33:25 56:11 126:8
71:1 72:1 73:1	28:9 32:18 35:12	139:25 140:7	126:18,23
74:1 75:1 76:1	39:16 45:11 47:4	hand 36:25 147:18	heard 4:21 80:14
77:1 78:1 79:1	65:17,18,19 66:4	handing 91:7	81:17 111:14,20
80:1 81:1 82:1	71:16 78:17 81:13	happen 136:8	116:24 126:3,25
83:1 84:1 85:1	103:3 108:21	happened 37:14	hearing 116:23
86:1 87:1 88:1	110:24,24 114:15	Haywoode 2:3 5:3	held 1:18 82:5
89:1 90:1 91:1	130:9 134:24	5:10 10:15,21 11:2	128:15
92:1 93:1 94:1	good 4:9 47:3 65:21	13:11 26:12 28:16	helpful 35:18
95:1 96:1 97:1	81:25 82:21,25	33:25 35:23 37:10	hereto 3:8
98:1 99:1 100:1	91:9	38:3,15,22 40:16	hereunto 147:17
101:1 102:1 103:1	govern 72:19	41:2,15 42:2,9,23	Herrick 1:18 2:7
104:1 105:1 106:1	governed 76:21	43:14,17 50:6	91:20
107:1 108:1 109:1	government 20:4,4	53:10,18 54:6,23	higher 11:2
110:1 111:1 112:1	20:22 69:11 72:8,9	55:12 56:2 57:6	Hill 9:24 21:6 98:19
113:1 114:1 115:1	72:11 94:11,12	59:22 62:25 67:5	hired 52:24
116:1 117:1 118:1	95:6	67:16 68:2,10 70:2	history 14:3 52:7
119:1 120:1 121:1	governmental 95:10	74:9,14 76:7 78:14	hold 74:23,24
122:1 123:1 124:1	governs 72:23	79:19,24 80:10,24	123:21
125:1 126:1 127:1	greater 27:24	81:16 82:4,7,24	home 9:24 10:9,18
128:1 129:1 130:1	Grenadier 126:8	83:3 87:24 88:2,7	21:6 48:19 97:25
131:1 132:1 133:1	127:14	88:8,17,25 89:11	Homes 97:25
134:1 135:1 136:1	Griffiths 6:5 7:13	90:16 91:11 98:5	honestly 56:5
137:1 138:1 139:1	7:15 12:17 20:6,7	98:12 99:18	hope 26:25 58:14
140:1 141:1 142:1	20:12,16,20 21:16	101:23 102:4	hour 8:6
143:1 144:1 145:1	21:22 22:2,5,9,10	106:24 107:18	hours 8:9,9 70:25
146:1,9,20 148:4	22:17,23 23:6,7,14	108:8,21 109:12	73:11,16,23 74:13

76:5 77:10 houses 18:23 housing 13:19 18:16 18:20 19:24 93:24 94:5,12 111:13 112:2 HPD 95:4 HUD 20:17 21:13 25:14 92:20 94:7 HUD-assisted 94:24 Huh 79:11 humanly 43:6 hypothetical 128:4 140:20 hypotheticals 138:18	including 15:21 48:22 51:11,18 106:6 107:16 135:15 income 18:16,20,23 19:24 112:9,12,22 136:11,12,16,16 136:22 137:8,15 137:16,21 138:5 138:10,11 incorrect 83:13,14 109:19 incurred 12:11 36:24 indefinite 130:13 independence 69:6 69:9,10,19 71:4 73:9 75:25 76:6,15 77:6,7,11,23 78:8 122:12,17 independent 5:4,6 32:21 33:14 40:11 72:2 73:3 87:7 148:15 indicate 41:14 indicated 111:16 indicates 45:19 indicating 26:13 28:16 62:25 67:5 116:18,25 131:10 individual 36:10 58:12 90:13 142:21 inform 96:12 information 29:18 31:4,7 37:25 42:17 67:20 86:21 99:2,7 100:22,25 105:4 117:12 118:18 119:5,6 127:7 140:25 inquire 88:13 123:14 inquiries 66:8,17	67:2,10,23 instances 60:24 instruct 7:4 instructive 18:21 insurance 51:19,20 intention 88:20 89:2 interested 147:16 interesting 67:12 interfere 41:3 internal 33:22 34:6 57:25 78:21 95:18 106:22 148:21 interrupting 124:21 investigation 107:8 investigative 108:13 investment 95:12 invoice 77:15,19 105:8,15 106:2,3,6 106:11,13 120:25 121:3,8,10,24 122:3,5,7,8 123:7 123:9 129:12 130:10,11 131:22 132:4,5,13,16,20 132:23 133:17,19 133:20,21,21 134:2 135:8,20 141:7,7,9,12 invoices 12:7 61:10 120:12,18,21 121:7,20 involved 23:8 60:5,7 78:11 84:18 95:3 130:21 144:14 involvement 54:15 involving 116:8 IRS 76:18 77:13,21 78:7,13 79:9,12,18 81:25 130:7 141:4 issue 32:14 33:11 37:15 45:17 46:8 47:25 69:18 78:16 92:22 94:16,17 95:8,16 124:7	128:25 129:4 143:11 issued 5:18 33:4,8 105:15 148:13 issues 52:6 64:13 106:19 122:24 item 45:13 items 28:19,20,22 31:15 32:12 106:6 117:13 120:9,21 135:18
J			
		J 2:18 January 83:22 Jennings 63:3,5,5 63:10,17 64:3,6 65:14 66:2,6,20,25 67:8,22 68:8 84:11 84:15,17,21 85:2 143:12,16,23 Joan 90:11 John 1:5 2:22 24:23 25:6,9 39:21 114:8 115:4 130:20,25 144:14 148:18 joined 115:25 journal 54:9,12,15 54:20 55:4,10 56:22 58:2,3,3,6,7 58:11,22,25 59:3,5 59:5,7,10,18 60:2 60:4,8,15 62:7,17 62:21 63:11,14 69:21 70:8,9,11 100:15 judgment 37:19 jurisdiction 140:16 justify 135:20	
K			
		K 146:4 keep 7:11,16,18,20 67:17 129:10 keeping 136:14	

Kelly 2:18 4:8,10 5:8,12,15 10:19 32:18,25 39:16 40:22 41:6,12 43:11 47:4 48:13 53:14 56:12 78:17 81:23 82:9,14 88:6 89:24 91:5,15 92:2 92:8 97:5,8 103:16 104:17 109:3 111:5,7 113:4,22 115:20 116:5 117:3 119:24 124:5 126:2,12,24 128:6,22 131:20 131:25 132:19 136:9 138:13 141:21 142:12 143:15,21 144:2 144:17 145:3,5 148:4 Kelly's 109:15 kept 35:3 123:15 138:19,23,25 139:9,10 Kings 2:5 knew 42:25 know 4:17 5:5,14 11:9 13:13 18:22 22:23 23:2,6 24:7 25:4,8 34:15,19 35:21 36:2 37:4 41:16,17,21,23 42:5 43:5,6 47:2 54:25 56:16,20 58:18,21,24 61:15 61:18 63:22 67:8 67:11 71:5,7,23 74:8,25 77:16,17 78:9,10 80:13 81:16 84:9,16,20 85:6 86:10 91:19 92:7 95:2 101:24 106:24 108:2,9,23	knowing 132:22 knowledge 57:13 75:20 84:19,23 85:10,13 86:13 99:16 130:20 131:3,5,6,13,16 knowledgeable 85:20,22,25 known 4:12 L L 1:5 2:21,22 3:3 4:3 146:4 labeled 142:2 Lacks 112:20 Lakeview 9:25 10:5 10:17 21:5 97:13 118:16,17 120:6 120:14 language 56:8,9 large 93:23 larger 74:5,6 law 19:8 80:18 90:14 91:20 lawsuit 104:9 114:8 114:18,22,24 116:2 lawsuits 115:3 116:7 116:10 lawyer 5:13 lawyers 81:19 laying 139:25 layman's 136:19 leading 110:7 learn 116:9 learned 127:9 ledger 29:8,10,12,15	29:20,21 30:3,14 30:24 31:5,8,15,25 32:4,7,13 60:11,17 119:14 120:22 ledgers 29:5 leeway 74:20 left 16:7 23:16 38:6 63:22 65:16 112:23 legal 21:25 22:5 104:8 128:5 legitimacy 105:19 length 69:14 letter 75:14 79:4,14 96:15 letterhead 39:19 78:20 96:23 148:17,21 letters 43:23 107:13 let's 14:2 82:10 91:15 103:12 123:24 124:12,19 127:24 level 74:7 134:5,8,12 134:13,18 143:19 143:25 liability 130:9 licensed 14:4,6,8 limit 84:25 limited 48:22 51:18 114:9 116:8 limiteds 114:4 115:13 line 56:13 61:2 79:20 149:6 listed 60:24 122:2,4 122:16 123:9 127:20 129:3,6 listing 29:22 59:5 lists 106:5 literature 21:8,11 25:15 litigation 90:19 little 10:7 106:15	LLC 2:9 22:3 LLP 1:19 2:7,15 91:21 loan 32:10 64:14,15 64:22,24 65:2,3,7 65:9,13 143:5,23 loans 31:21,21 32:6 local 51:17 Logan 9:24 10:7,19 10:21 21:6 27:24 83:20 97:20 137:12,14,25 138:2,7 long 14:10 16:16 71:16 80:18 136:6 look 6:17 21:13 44:7 45:11 68:25 87:5 87:11 103:3,5 113:23 119:23 looked 27:23 87:2,6 87:6,8,9,14,17 93:19 looking 50:16 61:5 62:22 117:14 loss 120:5 louder 4:18 low 18:16,20,22 19:24 M M 2:3,8,12,23 4:3 146:4 mailed 43:25 44:2 maintain 28:4 77:4 77:4 117:16 144:11 maintained 117:23 maintenance 51:14 major 27:12 141:5 manage 18:12,20 94:23,25 130:23 managed 37:5 144:22 management 2:9 6:5 26:14,15 33:11
--	---	--	---

38:10,10 40:4,8 46:4,6,23,24 48:21 51:12 53:8 54:16 58:23 59:11,13 60:25 61:2 69:24 70:16 91:22 107:15 126:7,7,8 126:21 127:8,25 129:9,13,15 130:18,22 131:2,4 131:8,15 135:9,15 135:19,21 136:5 136:24 139:21 140:18 141:17,20 141:24 142:6,6 144:11,22 manager 46:15 51:13 managerial 48:24 managers 111:16 manages 94:23 managing 114:3 128:17 130:22 142:21,23 143:24 Maple 2:4 March 13:2,3,5,8,11 83:23 92:14 93:13 93:18 105:12,13 105:14 Marion 126:7 127:14 mark 5:16 32:19 39:17 47:5 78:18 marked 5:19 32:22 39:21 41:13 44:18 47:8 78:23 Marks 2:16 4:11 6:6 58:21,25 61:20 62:20 66:12 67:13 69:17,19 70:6 74:25 75:18 77:20 85:3,7 106:11,13 107:16 120:25 125:14 134:14	139:5,7 144:12,24 marriage 147:14 master's 14:20 material 142:24 143:3 materiality 73:20,20 74:2,5,21 134:5,9 134:12,14,19,21 135:6 142:5 143:19,25 math 10:11 matter 5:23 32:16 33:6,10 42:10 50:17 60:9 63:20 70:7 89:12 91:23 129:16 135:3 138:3 147:10,15 147:16 matters 93:5 mean 15:4 25:17 31:9 50:15 53:24 56:20,21 65:5 68:22 79:17 83:16 84:6,13,25 104:25 106:2 108:23 116:11,13,16,21 117:9 122:9 128:23 134:21 135:7 136:23 141:6,14 meaning 70:3 means 52:9 55:3,19 55:24 57:10 80:4,6 127:20 130:15 meet 62:23 63:10,13 meeting 64:13 65:20 65:23,24 Mel 56:12 member 131:4 members 96:17 131:14 142:8 memo 41:22 memory 47:2 memos 43:23,24	mentioned 73:10 message 63:23 met 13:6 23:15 62:23 method 8:7 36:15,16 55:14 Metz 1:20 4:5 147:6 147:22 million 10:6,8,10,10 10:12,25 11:5,8,8 74:19 99:19 100:18 112:2,10 112:14,17,22,23 113:15,19 117:6 118:16,17 120:13 millions 60:13,14 minimis 70:22 71:21 71:25 72:20,23 73:13 74:4,7 76:21 77:8,22,25 78:4 minimum 65:8 Minority 16:14,17 16:20 18:22 19:3 24:12 minutes 139:15 misappropriation 133:14 mischaracterized 60:21 misleading 109:16 missing 97:15,21 98:2,21 misstated 83:9 misstatement 133:15 134:24 135:5 Misstates 126:11 128:21 Mitchell-Lama 94:7 mixing 129:10 modified 104:20,23 modify 45:9 105:2 money 11:16 36:8 37:23 38:13,21	60:4,7,20 97:15,21 98:20 100:8 101:21 110:23 124:3 125:14,14 125:24 126:6,15 127:13,15,22 128:2,15,19 138:3 138:9 139:19 140:17 141:19 monies 142:5 month 111:20 monthly 26:21 29:4 82:18 83:7,10 84:5 84:7 109:16,24 112:8 months 9:9,10 105:16 morning 4:9,15 88:18 89:13 mortgage 18:4 106:5,8 MOSKOWITZ 2:15 motion 109:10 moved 140:15 multiply 111:24 multiplying 112:7 mystery 13:15
N			
N 2:2,21 3:3 4:3 146:4,4 148:2 149:5 name 4:10 16:13,14 67:18 115:15,16 141:10,17 149:3,4 named 13:20 114:17 114:22,24 115:17 nature 17:10 61:23 106:22 110:7 143:4,5 Nealle 2:9 131:3 necessarily 30:2 82:21,23,25 necessary 21:19			

need 5:7 26:6 32:11 35:14 62:6,8,9,10 62:11,13,14 95:9 98:14 99:7 103:2 117:15 135:23 needed 89:8 92:16 92:17 negotiate 8:4 never 13:6 34:25 35:12 62:22,23 65:23,24 80:13 81:16 105:21 140:8 new 1:3,19,19,22 2:5,11,11,17 8:13 14:7 80:24 81:6 119:8 147:3,4,7,8 nine 127:23 nonaudit 70:23 73:6 76:14,25 77:5,9 78:3 non-cash 120:9 normal 27:2 North 13:16 Notary 1:21 3:12 4:4 146:25 147:6 147:22 149:23 note 39:5 67:12 142:20,22,25 143:6,9 noted 145:6 notes 87:10,14 notice 46:10 99:4 141:24 not-for-profit 15:20 16:11 18:5 November 103:25 nuance 56:11 number 11:3 28:19 34:10,13,16 35:16 35:17 45:19 60:3 61:3 69:22,23 70:14,19,20 73:25 93:25 99:14 101:5	105:19,22,23 109:24 110:2 121:5,6 122:10,13 122:14,23 129:17 numbers 10:16 101:3 112:16 121:12,17,19 122:2,3 123:2 numerous 18:3 69:20,21 O o 2:21 3:3,21,21 4:3 4:3,3 146:4 oath 146:11 object 54:23 57:6 88:2 98:5,12 103:16 objected 50:19 objection 38:3,15,22 42:2,24 43:9,17,18 53:10 54:6 55:12 56:2,14 68:2,10 74:9,14 76:7 78:14 79:19,22,25 80:2 81:10 88:7,9 98:10 101:23 110:6 112:19 113:2,4,22 114:13 119:19 121:14 123:18 124:5 125:20 126:2,10,12,24 127:18 128:3,6,20 128:22 141:21,22 142:12,13 143:2 143:14,15,21 144:2,4,16,17 objections 3:16 80:17 observation 36:12 obviously 36:12 68:24 105:18 122:9 occasion 82:17 occurred 42:22	65:23,24 October 78:22 148:22 offer 63:10 offhand 25:17 office 15:8,11,15 16:8 45:14,24 46:12,14,14,20,21 48:20,23 52:14 63:23 69:11,12 90:14,17,19,20,23 offices 1:18 Oh 19:14 31:20 54:10,13 68:18 82:3 83:11 104:19 Okay 40:22 43:14 57:3 92:8,12 99:15 104:4 115:18 116:3 145:5 once 11:22 21:7 28:12 29:2 42:23 63:19,23 133:8 ones 41:4 44:11 opening 29:13 opinion 39:10 45:3 45:5,7,9 68:11 70:18 opportunity 62:23 98:22 111:8 opposed 36:18 oral 92:4 104:17 orally 104:21 order 26:2,4,6 30:8 30:11 62:4 85:5 139:4 organization 2:10 9:6 16:11,12 26:8 55:8 74:6 77:2 91:23 142:7 organizational 96:6 96:9 organizations 15:20 organized 93:14,15 93:17	original 91:3 102:14 102:22,24 originally 103:7 originated 107:22 Orley 1:16 5:1,17 6:1 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1,7 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1 82:1 83:1 84:1 85:1 86:1 87:1 88:1 89:1 90:1 91:1 92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1 100:1 101:1 102:1 103:1 104:1 105:1 106:1 107:1 108:1 109:1 110:1 111:1 112:1 113:1 114:1 115:1 116:1 117:1 118:1 119:1 120:1 121:1 122:1 123:1
---	---	--	--

124:1 125:1 126:1 127:1 128:1 129:1 130:1 131:1 132:1 133:1 134:1 135:1 136:1 137:1 138:1 139:1 140:1 141:1 142:1 143:1 144:1 145:1 146:1,9,20 148:4,19 149:4,20 Orly 5:18 148:13 outcome 78:12 147:16 outside 24:8 66:15 84:17,21 86:12 102:6 103:14 outstanding 12:7 122:8,16 overarching 73:2 overhead 48:21 oversaw 18:25 oversight 16:5 owed 126:6,21 owned 142:7 144:10 owner 51:10 52:18 52:23 130:25 owners 131:7,12 o'clock 91:14	139:22 142:5,9 Paneth 2:16 4:11 6:7 58:22,25 61:20 62:20 66:12 67:13 69:17,19 70:6 74:25 75:18 77:21 85:3,7 106:12,14 107:16 120:25 125:15 134:14 139:5,7 144:13,24 papers 48:5 paragraph 39:7,11 47:19,24 48:4,16 Park 1:19 2:10 89:15 part 38:6 52:3 54:15 61:25 62:3 80:19 105:11,17 106:4,5 114:19 116:22 121:21,23 127:5 130:25 135:20 particular 7:17 27:21 58:7 90:14 142:9 parties 1:17 3:8 142:4,11 147:15 partner 114:3 130:23 142:23 143:24 partners 17:6 106:11 110:3 114:9 116:8 127:11 128:17 137:17,18,21 140:5 142:22 partnership 23:5 46:5 102:10 137:2 137:8,12,14,24 138:7,8,23 142:10 partnerships 26:18 30:23 31:19 33:23 36:9 37:5,24 38:14 66:21 69:18 75:3 95:8 99:22	partnership's 93:24 parts 65:22 party 140:15 142:14 142:16,17 144:8 Pause 91:16 pay 45:21 66:4,6 128:10 137:16 138:10 payable 31:22,24 51:12 62:12 126:5 126:20 127:5,7,20 129:3,14 136:4 140:17 142:22 143:23 paying 128:16 payment 46:11 47:25 50:15 53:15 119:9,10 121:22 121:22,23,24 134:17 136:10,21 136:25 payments 101:9 102:9 122:5,6 135:8 payroll 48:21 pending 115:9 penny 135:4 people 44:23 percent 9:17 11:12 12:20 25:3 percentage 24:22 25:4,8 perform 17:14,15 17:20,22,25 73:6 93:4 performance 16:4 performed 70:24 121:5 performing 31:17 49:10 period 9:7 64:16 65:2,7,9,10 119:9 119:11 122:21,22 127:23 130:4	135:23 permissible 79:22 80:2 81:11 permit 124:8 144:6 permitted 23:4 76:14,15,18 88:13 person 85:19 personal 138:11 personally 12:17 24:23,25 personnel 48:25 50:20 51:14,21 52:11,16,22 90:20 perusing 33:3 79:5 phone 135:16 phrase 57:8,15 Phyllis 2:8,23 131:14 Place 89:15 Plains 2:17 plaintiff 115:25 Plaintiffs 1:6 2:4 planning 25:21 26:3 28:21 Plaza 27:24 pleadings 104:8 please 4:16 6:17 92:6 104:18 plus 112:12 point 29:9 32:14 49:22 71:20 72:4 74:24 79:21 81:10 123:14 136:20 pointed 120:24 pointing 109:7 points 69:5 pose 122:17 position 50:14 53:15 53:23 54:3 64:20 positions 50:11 positive 111:23 possession 35:22,25 89:23 109:2 possible 43:6
---	---	--	--

postage 48:24	problem 56:15 122:7,9,12,18	promulgated 69:7 72:16	96:13,16,18,20 97:11,14,20 98:20
practice 12:21 16:22 16:25 17:3 21:18 22:9,11,14,18 23:24 24:10 80:17 80:25,25	problems 26:22 141:5	properly 119:18 133:11	99:17 107:14 109:4 117:24 148:17
practiced 22:6,18	procedures 86:22 86:25	properties 13:24 130:23	Pryce's 24:15
prefer 53:21	proceeding 80:23	property 115:7	Public 1:21 3:12 4:5 146:25 147:7,22 149:23
prepaid 119:5,14	proceedings 147:9 147:12	prophesies 140:19	purpose 51:24
preparation 75:2,8 75:13,23 87:18,22	process 58:7,12 62:16	prophesying 140:21	purposes 61:5 65:5 65:8
prepare 89:19,22	profession 19:13 141:14	prophet 141:23	pursuant 1:17 53:17
prepared 90:20 104:9 129:18,19 129:20,21,24	professional 1:21 14:2 19:16,22 68:7 85:15 124:24	proposed 58:25 59:8 59:12,17	put 11:25 36:4 59:4 65:17,19 85:4 96:18 125:7 133:13 143:12
preparer 76:4	professionally 15:2 16:9	proposition 74:23	Putting 56:24
preparing 25:15,21	professors 81:19	proprietary 105:20	p.m 82:12 145:6
presence 84:22 86:12	proffering 124:15 125:2	proprietorship 22:7 23:21,25 24:4,8	<hr/>
present 28:17 40:20	profit 113:9	provide 17:12 18:16 18:22 19:24 21:19 28:18 40:13 42:8 42:12 61:16 67:23	Q
presented 129:13	program 14:21 26:4 26:5	provided 17:11 40:18,24 41:10,14 41:20,21 42:7 48:18 67:21 73:22 75:2 89:25 99:6 107:13 119:16,21 120:19 121:9 135:12	quality 106:22
Prestige 126:7 127:14	programs 25:22	provides 25:6,10 74:3 75:23	quantify 60:10
previous 111:16 126:21 136:4	project 9:18,21 21:20 25:19 45:20 45:25 46:15,15,16 46:20 49:3 51:13 51:23 52:4,9,12 53:7,16 54:2 63:7 82:22 83:5 92:14 92:15 93:19,22 102:15,16,20,21 102:22	providing 105:10	Quebec 56:10
previously 111:14 126:19	projections 98:7	provision 46:10 52:20	question 3:17 4:19 4:22 43:4,9,12 53:11,21 54:24 55:16 56:5 58:15
price 8:4,12 78:9	projects 9:23 10:4 10:13 11:6 13:19 18:20,24 20:9,22 21:5,9 25:18 27:22 45:21 54:17,22 55:11 58:24 93:24 94:6,12,24,25 102:11	provisions 72:19	58:18,19 73:21 74:10,15,16 76:12 85:11 88:20 89:9 90:16 92:3,6,18 98:13,16,18,24 107:7 108:22
primary 85:15	Pryce 6:5 7:13,15 12:18 20:7,7,12,16 20:20 21:16,22 22:2,5,9,17,18 23:2,8,14,17 24:2 24:7,9,19 25:9 39:20 40:25 66:9 84:10,20 85:12,16 85:20 86:11 88:16 93:12,14 96:4,10	Pryce 6:5 7:13,15 12:18 20:7,7,12,16 20:20 21:16,22 22:2,5,9,17,18 23:2,8,14,17 24:2 24:7,9,19 25:9 39:20 40:25 66:9 84:10,20 85:12,16 85:20 86:11 88:16 93:12,14 96:4,10	109:15 110:7,8 111:8 113:8 114:15 122:25
principal 130:21,24 131:7	questioned 107:20	123:6,20 124:6,9 124:13 125:6,7,10 125:12 131:21	
principals 130:17 131:18	questioning 56:13 91:6	questioning 56:13 91:6	
principle 73:2 130:16	questions 4:15 5:9 44:16 64:3,7,9,11	questions 4:15 5:9 44:16 64:3,7,9,11	

65:19 91:24 108:4 111:4,6,9 115:19 115:20 116:7 117:5 119:25 132:2 138:14 quickly 123:19 quite 94:15 122:23 quote 70:10 quoted 48:10	received 12:2,15,16 15:20,23,25 27:8 27:10 28:25 29:9 36:23 117:18 118:22 119:3 138:9 144:19,21 receiving 26:20 67:24 109:17 113:19 recess 82:10,11 reclassified 135:9,23 reclassification 60:16 135:13 reclassified 60:25 61:11 reclassifying 135:20 recognize 36:21,23 47:14 recognized 65:6 recollect 40:15 recollection 113:18 113:20 reconciliation 28:19 28:25 reconciliations 31:14 record 7:16,18 40:16 48:14 81:15 82:4,6 88:15 107:12,24 108:25 114:16 115:23 119:17,20,22 126:13 146:14,16 147:11 recorded 132:6 133:11 records 6:13 58:23 61:25 62:5 70:15 100:23 103:3,5,8 103:22 106:23 117:7,10,16,18 118:2,4,11,19,22 119:3,13,23 121:18 122:4	123:10 127:3 138:18,23 reference 48:4,9 referred 39:10 69:24 70:5 108:10 109:5 132:4 referring 7:12 9:23 19:3 27:21 36:20 40:7 46:3 49:6 60:3 69:8 71:24 72:6 75:5 87:2 93:11 99:9 107:11 118:3 123:8 137:24 reflect 60:20 114:16 reflected 31:25 32:4 32:6,9 105:5 reflecting 6:9,10 93:2 refresh 113:18,20 refuse 64:10 regard 7:9 69:19 70:7 84:5 85:21 111:12 139:13 142:4 regarding 40:8 45:3 63:6 68:15 131:22 132:3 138:18 regardless 142:24 Registered 1:20 regular 7:20 12:21 21:2 93:7 regulated 20:8,13 20:17,21 23:9 94:6 94:11,12 regulation 94:17,20 95:15 regulations 95:10 regulatory 25:20 reimburse 51:10 reimbursements 51:22 related 79:7,9,12 97:3 108:16 142:4	142:11,14,16,17 144:7 147:14 relating 57:20 135:19 relation 137:22 relative 74:20 relevance 78:15 79:20 relevancy 57:7 79:22,25 81:11 relevant 68:12 84:8 relied 34:6 relying 34:8 remained 80:9 remains 35:8 141:9 remember 14:10 16:21 42:3,4,15,21 46:25 50:12 62:19 64:25 72:3,21 73:17 89:17 90:9 95:14 103:23 106:7 112:13 118:15 remind 125:11 renamed 141:6,6 render 45:2,5 70:18 rent 46:22 51:25 rental 51:22,24 rephrase 4:17 92:7 report 32:15,22 33:4 33:8,15,18 36:17 40:11 60:24 61:16 61:22 71:9 99:4,8 99:9 100:6 103:24 104:2,12,12 108:13,24 113:9 113:10 133:16 136:15 137:14,21 148:15 reported 100:9 113:11 120:5,22 121:18 147:9 reporter 1:21 5:16 32:19 39:17 47:5
(212) 279-9424	VERITEXT REPORTING COMPANY www.veritext.com	(212) 490-3430	

49:17,21 78:18 reports 39:3 40:13 40:18,24 41:8,9,11 41:19,24,24 42:6 44:17 45:2,9 82:18 83:7,10 84:5,7 107:9 represent 4:10 78:5 88:15 91:21 representation 40:17 76:16 77:20 88:11 represented 4:24 5:4 request 31:17,20,20 31:21,21,23 32:11 35:20 71:5 requested 28:23 67:20 69:24 requesting 107:17 requests 26:2 106:10 require 28:21 35:20 required 19:14,25 31:4 65:3 142:17 143:6 requirement 14:13 69:14 92:20 130:7 130:8 requirements 21:14 95:11 requires 70:22 144:7 reserved 3:18 resident 51:15 52:2 respect 35:17 respond 38:17 66:8 67:23 responded 117:6 responding 66:16 67:2,9 response 96:14 109:10,14 132:9 132:11,12	responsibilities 71:13 responsibility 59:11 59:13 70:16,17 result 136:11 retain 44:3 retained 103:7 retainer 102:17 retaining 96:14 return 80:8 130:3 returns 103:15 129:17,18,24 revenue 10:13 11:5 24:18,22 25:5,9 34:16,19,21,22,23 35:8 78:21 148:21 revenues 9:17,21 10:4 12:20 31:23 34:25 35:2,4,10 36:22 37:9,12,13 37:20 revenue-based 25:19 reversed 37:17 review 7:2 12:13 13:18 16:5 21:8,11 25:15 26:7 33:2 57:12 62:16 82:18 82:20 103:7,14 106:8 107:6 118:23 127:3 reviewed 13:22 83:25 129:5 reviewing 25:14 97:13,19,24 98:18 101:8 right 21:24 48:15 52:10,13 55:2 57:21 64:12 66:7 66:10 70:4 73:13 85:18 90:25 91:10 91:11 98:17 100:11,13 102:20 103:8,9 116:20	118:5,21,21 121:21 136:7 138:6 139:11 Robert 1:8 2:8 131:14 role 86:3 Ron 28:15 34:14 35:17 37:7 44:13 50:2 58:16 62:19 66:3 70:10 91:22 131:9 Ronald 2:9,23 roughly 102:14 rule 70:22 71:2,21 71:25 72:17,20,24 73:13,15,19,20,22 73:25 74:4 76:15 76:18,21 77:8,8,23 77:23,25 78:4,8 80:22 81:6,7 rules 79:23 80:3,20 81:9,9,12 running 110:2 R.P.R 147:6,22	says 52:16 71:3 73:5 74:12 schedule 31:22,23 scope 39:8 92:15 93:19 103:21 Scott 126:7 127:15 sealing 3:8 Seavey 1:8 2:8,8,9,9 2:10,23 4:13 91:21 91:23 127:10 131:3,14 140:4 142:7 144:10 149:3 Seaveys 79:15 101:10,11,12,21 102:11 110:24 139:18 second 38:6 80:10 115:5 128:10,16 141:19 seconds 82:8 143:11 section 49:5 51:9 52:16,21 53:2 72:14,18 Security 51:19 see 13:21 31:21 32:10,11 33:13 39:12 44:15 45:13 47:22 48:7,8,9 safe 83:8 salaries 45:13,23 46:12,22 47:25 salary 144:20 sale 115:6 salient 69:5 Sandra 64:2 84:14 84:15 86:7,18 87:8 SAS 69:12 72:21,23 87:8 saw 56:22 69:21 77:15 79:7,14 82:20 83:12 118:11 121:6 saying 41:15 79:15 119:2 132:15 141:3
---	---	--	---

separate 21:17 60:11	signed 3:11,13 49:14 146:21	107:19 118:16 spend 7:25 83:6 spending 8:16 spent 6:10 7:16 67:2 100:12	81:14 88:18 92:6 102:25 110:5 122:15 143:8 statements 17:17 18:2 26:21 31:18 39:10 45:4 61:14 61:20 95:24 103:15 107:9 109:17,25 110:15 110:16 132:7 states 1:3 48:17 51:10 73:23 74:2 81:6 stating 88:14 108:25 step 28:13 steps 21:8 26:5 STIPULATED 3:6 3:15 stop 141:18 stopped 16:19 Street 2:4 77:13 78:6 89:14 111:13 111:18 112:10 113:9,19 114:2 strictly 34:19 Strike 89:24 136:9 structure 57:25 106:23 studies 19:8 subjected 77:13 submitted 48:5 subpoena 1:17 5:16 5:18 6:21 7:2,2,6 148:13 subscribed 146:21 149:21 subsequent 33:17 104:5 119:11 subsidized 20:22 substance 73:3 sufficient 39:8 99:6 suggested 113:17 suggestion 80:16 81:18
separately 75:18,20	similar 33:18 67:18 81:2	spend 7:25 83:6 spending 8:16 spent 6:10 7:16 67:2 84:13	122:15 143:8 statements 17:17 18:2 26:21 31:18 39:10 45:4 61:14 61:20 95:24 103:15 107:9 109:17,25 110:15 110:16 132:7 states 1:3 48:17 51:10 73:23 74:2 81:6
series 4:14	simply 41:15 93:5 108:25	spoken 56:10 spot 25:24	stating 88:14 108:25 step 28:13 steps 21:8 26:5 STIPULATED 3:6 3:15 stop 141:18 stopped 16:19 Street 2:4 77:13 78:6 89:14 111:13 111:18 112:10 113:9,19 114:2 strictly 34:19 Strike 89:24 136:9 structure 57:25 106:23 studies 19:8 subjected 77:13 submitted 48:5 subpoena 1:17 5:16 5:18 6:21 7:2,2,6 148:13 subscribed 146:21 149:21 subsequent 33:17 104:5 119:11 subsidized 20:22 substance 73:3 sufficient 39:8 99:6 suggested 113:17 suggestion 80:16 81:18
serious 134:25	Singers 114:23	spreadsheet 60:11	
served 6:21,25	sir 49:18	ss 147:3	
service 70:23 73:6 76:24,25 77:4,5,9 78:3,21 121:4,5,9 148:21	sit 12:8 118:14	stages 99:23	
services 15:6 48:25 49:11 51:16 71:14 71:14 73:7 75:2,23 75:24 76:15 89:2 135:15 144:12	sitting 116:15	standard 20:3 28:20 35:19 41:24 42:6 59:13 69:2,7 70:21	
set 66:12 71:12 73:15 106:20 147:18	situation 57:11,12 57:14 138:11	71:23 72:2,6,10,21 76:22 87:7 93:8 144:5,7	
setting 104:13	six 43:8	standards 20:5 28:11 57:16 59:10 68:16,20 69:13	
seven 23:13 43:7	social 15:6 51:16,19	70:13 72:9,9,12,25 86:22,23,25 96:2	
shaking 129:23	sole 22:7 23:21,25 24:4,7 59:10 70:15	141:3,4	
share 27:18	somebody 30:13 49:22	start 16:22 103:11 103:12	
shared 87:10,14	sorry 10:15 19:10 27:9 34:21 35:23	started 9:20 10:3 16:24 17:4 25:12 28:12 100:20,21	
sharper 85:25	104:19 105:13 118:24 125:16 129:8 138:21	100:24	
sheet 29:14 119:14 130:13	sought 115:6	starting 8:13	
short 82:10	sounded 74:15	state 1:22 14:7 15:7 15:10,15,16,19,21	
show 40:16 81:3 101:17 108:14	sounds 55:13	15:22,23 16:2,3,7	
showed 110:16,19	sources 135:11	speaking 140:19 70:13,14 80:15,21	
showing 27:5 83:20	SOUTHERN 1:3	80:24 81:7,9	
shown 104:7	speak 4:17 39:3 63:16 108:6	107:12 147:3,8	
shows 101:18 119:8	speaks 54:7 73:19 73:20	stated 102:15 109:14	
Shron 2:16 4:11 58:22 61:21 66:12 67:14 69:17 70:6 74:25 75:18 77:21 85:3,8 106:12,14 107:17 120:25 125:15 134:14 139:6,8 144:13,24	specific 21:15 72:4 87:2,15,17,19 106:7	statement 21:3 26:22 28:10 45:6 45:22 50:24,25	
Shron's 69:19	specifically 21:17 51:9 69:13 70:13	51:5,7 62:6 69:12	
shun 135:6	70:14 74:2 79:8		
sic 5:19 148:13	95:19 103:23		

suits 115:12	talks 81:5 106:9,9	108:19 113:6	throwing 111:23
sum 8:19	106:10	115:24 126:5,14	time 3:18 5:11 6:10
summary 29:23	Task 16:14,17,20	126:19 128:14	7:16,18,21,21,23
32:2,5	18:22 19:4	136:5 143:10	7:25 8:3,15,25 9:2
superintendent	tax 17:13 51:17 65:5	testify 124:22	9:7,20 10:3 14:24
51:15 52:2	65:8 75:2,7,12,16	testifying 74:10	31:9,10 37:2 49:10
supervised 52:24	75:23 76:3 80:8	126:16	49:14 50:25 51:7
supplemental 71:9	103:14 119:6,8,9	testimony 40:7 49:7	65:16 66:4,6,21,25
supplied 42:24,25	119:15 129:17,18	68:4 74:16 76:8	67:9,23 68:9,12
47:17 130:10	129:24 130:3	108:6 109:21	78:10 82:3 83:6
141:7	138:10	124:21 126:3,9,11	84:13 88:4 91:9
supplies 48:23	taxable 136:12,15	126:23,25 128:21	93:13,15 94:9
support 101:2	136:16,22	143:17 146:11	128:10,16 130:4
105:10 119:5	taxes 51:19 106:9	Thank 72:13 97:8	141:19 142:23
120:13 127:4	137:16	theoretical 113:7	145:6
143:13	taxpayer 76:17 82:2	theoretically 112:23	times 80:12 132:20
supported 98:9	technical 57:22	113:7,8	timesheets 6:8,10
supporting 32:12	136:20	thereabouts 11:8	7:9,11
98:8 99:21 100:14	technically 129:16	thing 21:12 81:25	title 33:18
sure 21:10 23:10	130:3	92:10	titled 33:14
28:6 42:11 55:19	telephone 48:25	things 34:18 43:5	today 4:12,25 5:9,22
88:12 104:5 109:9	tell 5:12 7:8 26:17	96:23	6:2,19,23 7:5 12:8
120:8 130:19	36:14 38:12,20	think 5:3 11:7 12:4	28:17 86:14 92:2
131:7 132:11	41:7 43:6 50:9	13:17 14:9 15:12	107:21 116:14
140:3	68:19 92:15 93:23	16:13 27:6 28:15	118:14
suspicions 73:8	94:5,9 99:17,24	37:14 41:12 43:4	told 13:20 37:7
sworn 4:4 108:5	100:17 109:25	43:11 45:20 46:17	68:23,24 88:4
149:21	110:9	48:10 62:24 63:18	89:14 92:16 94:15
system 30:21 31:13	tells 141:15	64:24,24 65:21,21	105:3 110:10
T		71:11 72:2 73:19	130:25 139:24
T 2:21 3:3,3 146:4	ten 140:14 141:16	79:14 84:3 85:24	140:4,6
148:10 149:2,2	141:17	89:7 90:11 95:7	tool 29:24 30:20
take 9:8 21:8 30:13	tenant 102:10	100:19 103:24	tools 55:4
31:7 45:11 82:10	ten-year 65:2	104:11 105:9,9,16	top 33:13
91:9 108:22	term 54:9,12 55:17	105:23 107:6	topic 135:24
taken 1:17 7:22 19:8	55:20,24 56:17,19	108:3 111:5	total 8:18,19 30:11
19:11,15,22 20:2	57:4,18,22,24 98:6	119:10 121:7	38:4 110:2 133:21
36:9 37:23 38:13	136:17 138:5	128:24,24 129:4	134:2
38:21 82:9,11	terminology 108:23	131:16,17 132:4	totals 30:14
142:20 146:11	terms 28:7 38:19	133:20 140:4	Touche 23:12
talk 69:9 71:24	86:5 93:25 94:13	thirteen 105:16	transaction 142:14
talked 71:20	94:14 136:19,20	thought 9:13	transactions 30:4,7
talking 83:21 104:2	143:6	three 23:15,16 75:15	134:6,9 142:10,16
115:8,11	testified 4:6 76:10	75:17 86:5 96:17	142:18 144:8
	87:12 104:11		

transcript 3:11 107:7 108:5 146:10,13 147:11	10:10,18 16:18 34:13 35:17 44:17 45:2 62:8,14 69:23	45:10 62:21 unions 18:4 unit 51:25 111:17 UNITED 1:3 units 94:2 111:25 unusual 27:3 update 100:22 117:7 117:9	140:22 way 21:15 29:6 36:5 51:5 55:7 59:4 60:13 61:3,8,13 74:23 89:7 104:20 116:22 130:21 132:22 147:15 website 21:13 25:14 went 21:12 44:22 86:20,21,22,24 140:15 we've 80:11 whack 26:24 whatsoever 13:23 WHEREOF 147:17 White 2:17 William 2:18 63:2 willing 13:18 WILSON 2:15 wind 80:14 81:17 withdraw 53:14 witness 5:2,7 6:16 10:20,22 26:15 32:25 33:3 34:3 36:2 37:11 38:17 38:24 49:19 53:12 53:19 55:17 56:15 57:9 59:24 67:7 70:4 74:17 79:5 88:23 91:7 97:7 107:5,21,22 108:3 113:5 116:20 118:25 124:24 125:6 129:8 131:23 147:17 148:3 149:4 witness's 38:4 68:3 76:8 108:5 124:21 word 26:25 44:8 106:3 wording 46:17 106:7 WordPerfect 90:7 words 100:13 103:4
transcripts 81:17	70:20 105:23		
transferred 15:7	115:3,12 121:6		
transportation	122:14 125:24		
48:24	129:10		
Traub 2:12 79:21	type 17:14,24 21:25		
79:25 80:21 81:8	22:11,14,17		
88:14 91:8,13,18	typed 90:17,19		
91:20 98:10,14	types 73:7 95:11		
106:24 107:6		U	
108:3,11 109:9		U 3:3	
111:3 112:19	um-hum 4:23 10:22		
113:2 114:13,21	45:15 47:13,21		
115:8,14,23 117:2	49:12,15,16,21		
117:5 120:2,4	79:3 96:24 97:4		
123:18,22 124:10	104:16 118:5		
124:14,22 125:2	137:19,23		
125:20 126:10,13	unable 100:6,9		
127:18 128:3,20	unaccounted 97:15		
129:7 137:11	97:21 98:2,6,21		
138:16 140:10,22	understand 4:16		
141:22 142:13	10:5 23:20 44:15		
143:2,14 144:4,16	53:11 55:17 56:5		
145:4 148:6	57:19,21 92:5		
Treasury 78:22	95:11 104:25		
148:22	understanding 9:19		
treat 65:13 141:15	10:2 33:22 36:14		
treated 49:3 51:23	40:21 45:16 53:5		
52:4	53:13 54:14,19,25		
trial 3:18 26:6,10,13	55:3,9,18,21,24		
28:20,24 29:4,19	56:7,9,18,21 57:2		
29:23,25 30:15,19	57:5,7,10,13,15,19		
30:19 31:4,8,15	57:24 58:2,5,10,14		
34:11,12 60:12	58:16 66:24 95:9		
true 110:13 121:20	understands 38:18		
138:22 146:13,17	53:20		
147:11	understood 4:20		
try 71:17	undertaken 66:16		
Turning 89:18	undertook 28:13		
twelve 21:18 144:21	unequal 110:23		
twice 125:24	unfortunately 25:23		
two 9:8,8,10 10:10	26:9 30:17 34:7		

110:23 117:11	23:13,15,16 65:11	02 61:10 121:11,24	148:13
121:17	125:24 127:16,23	122:9,12,19	13-B 51:9
work 7:22 11:10	140:14 141:16,17	131:22 132:5,5,8	131 148:5
12:11,14 13:4,7,10	year's 61:11 71:10	132:13,16 133:4	138 148:7
13:23 15:10 16:16	Yellow 20:3 87:9	133:12	14 32:19,23 33:2
17:10 20:6 21:20	York 1:3,19,19,22	03 72:16	39:5 40:10,23
24:11 33:20 39:8	2:5,11,11,17 14:7	04 105:12,13,14	41:19 44:18 99:10
57:20 63:6 66:15	80:24 81:6 119:8	121:5,9	99:14 104:3,4,14
73:11 74:22 75:8	147:3,4,7,8	05 93:18 105:9,9,15	104:21 105:5
75:12 82:15	<hr/>	121:2,3	106:20 108:17
105:25	<hr/> \$	06 27:5,6 71:5 77:19	148:14
worked 15:4,5	\$10 11:5,8	83:22 84:3 102:25	140 148:9
16:10 23:11 62:19	\$150,000 12:6	103:12 112:12	15 39:18,22,24
86:6	102:14	114:5 121:11,25	40:11,23 41:19
working 16:20	\$160,000 12:16	122:20 132:8,14	44:18 45:12 99:11
57:13 82:22 83:5	102:14	132:14,25 133:2,9	99:13 104:14,21
workman's 51:20	\$181,000 12:6:4	133:12,24 139:20	105:5 106:20
workpapers 7:19,19	127:7 139:13,19	139:23	108:18 148:16
117:20,23	139:22,25	07 13:3,5,8,11 83:23	15,000 133:24,25
world 108:19	\$191,000 135:25	83:24	150 12:4,16 89:14
wouldn't 125:23	\$2 10:25	08 103:25	16 47:6,9,11,14,16
writing 40:14 43:15	\$2,000 113:17,20	08-CV-5648(HB)	89:18,20,21
49:18	\$200,000 64:25	1:7	148:19
writings 42:8,12	\$22,000 105:8	<hr/> 1	16-1 48:16
written 28:2 104:12	106:14,17 123:7	19 17 11:12 12:20	160 12:5
130:5,5,11 137:7	\$29,000 143:9,13,23	1.5 10:20,21	17 78:23,25 148:20
137:20 141:13	\$3 74:19 112:17,22	1:20 145:6	181 136:3,4
142:3	112:23 120:13	10:20 1:12	181,000 126:18
wrong 83:9 127:25	\$3.12 111:25	100,000 133:22	137:15,22
wrote 96:6 136:10	\$300,000 27:8	10016 1:20 2:11	1990 15:12,13
<hr/> X	\$34,000 71:6,8,10	106th 77:12 78:6	1990s 127:13
x 1:4,10 148:2,10	\$4 99:19 100:18	111:13,18 112:10	1992 14:9
<hr/> Y	117:6	112:18 113:9,19	1994 16:23,25
Y 4:3	\$5,000 71:2 73:11	114:2	<hr/> 2
year 16:19 19:21	73:16,24 76:5	10604-3407 2:17	2 1:19 2:10 89:15
23:11 91:4 105:20	\$6 112:14	11:56 82:12	2.1 118:16,17
110:4,17,20 112:3	\$6,000 27:7	111 148:8	2000 103:3 126:4
112:11 130:3	\$6.8 113:19	11225-5001 2:5	141:2
139:3 141:2	\$638 111:16,20	116 148:4	2002 103:11 122:3
yearend 77:14	112:8	12:04 82:12	123:16,17 124:3
yearly 111:17 112:8	\$9.5 11:8	120 148:6	125:16,17,18
112:17	<hr/> 0	123 148:8	2003 77:14
years 15:10 16:18	0 3:21	13 5:17,20 6:17,18	2005 123:6 125:14
	01439.00148 2:19	51:9 52:16,22 72:4	2006 78:22 99:21

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<p>103:6,8,14,21 113:10 120:5,14 125:21,22 134:18 148:22 2007 92:14 93:13 2009 1:11 146:12,22 147:18 149:3,22 2012 127:24 21 1:11 149:3 21st 146:12 221 80:20,21 26 72:4 78:22 148:22 260 84:3 28th 147:18 29 103:25 29,000 32:11</p> <hr/> <p>3</p> <p>3 2:17 45:12 72:3,15 3rd 63:2 3,000 27:8 30 65:11 30-year 64:16 300,000 27:10 32 148:15 34,000 71:11 34,155 71:11 35 82:7 39 148:18</p> <hr/> <p>4</p> <p>4 47:20 148:4 40 19:21 70:25 73:11,16,23 74:12 76:4 77:10 42nd 89:14 446 111:25 112:7 47 148:19</p> <hr/> <p>5</p> <p>5 25:3 45:13 148:13 5,000 74:13 77:10</p> <hr/> <p>6</p>	<p>6 112:12,22 600,000 27:9 651,000 83:20 6955-004 2:13</p> <hr/> <p>7</p> <p>7 112:10 71 2:4 78 148:22</p> <hr/> <p>8</p> <p>8 48:16</p> <hr/> <p>9</p> <p>91 148:6 92 14:9 15:13 19:4 93 15:13 94 15:13 19:5</p>		
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